

Operator Guidance Summary and Structure

C-104 Completion Packet Submissions

The Oil Conservation Division (“OCD”) Operator guidance is designed to outline the base line of which documents, file types, and parameters are needed for the submission type listed in the header of this document. This guidance is written to be a high-level guide and is not intended to be all inclusive as there are times when variables occur outside the scope covered herein and may require additional information or steps. The structure of these documents utilizes a bulleted system and is formatted as follows:

Introduction summary of the form and applicable rules.

- Prerequisite submissions
 - Submission A
 - Submission B
- Main application/sundry name (links will be included if applicable)
 - List of required attachments
 - File A
 - File B
 - File C
 - List of additional attachments (information helpful but not required in most cases)
 - File D
 - File E
- Information needed on each file listed above (required and optional files)
 - File A
 - [Information here] I.E. API #
 - ❖ [Parameter here] I.E. Must not be duplicate API #
 - Continued as needed.
 - [Information here] I.E. API #
 - ❖ [Parameter here] I.E. Must not be duplicate API #

***** End of Structure *****

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C-104 Completion Packet Submissions

A C-104 commonly known as the C-104 Completion Packet consists of multiple forms, these forms are used in unison with each other during the review for OCD staff to review the overall construction of the wellbore and the completion to ensure the wellbore is constructed in accordance with OCD rules for casing, cement, perforations, and spacing requirements.

The submissions are broken up into three categories. The three categories are to be used as follows:

- [C-104] Completion Packet – Test Allowable (C-104RT)
 - To be used for when a well needs a temporary approval to test the well or flowback, an approved C-104RT grants a 30-day approval for vertical/deviated wells, and a 90-day approval for horizontal wells. Ideally this is submitted two weeks prior to expected flowback operations commencing. This submission type does not require a C-105.
- [C-104] Completion Packet (C-104NW)
 - This is the submission for new wells and recompletions (C-104RC). Upon approval this will grant authority to transport with no expiration date as long as no changes to the wellbore occur such as additional perforations or changing zones (deepen or plugback). OCD does retain authority to revoke authorization to transport for other reasons such as violating OCD rules and regulations. All items in each form are required to be filled out and completed. A C-104, C-105, C-102 as drilled, and survey are required to submit.
- [C-104] Completion Packet – Tight Hole/Confidential (C-104CT)
 - This submission mirrors the above C-104NW submission but requests a temporary confidential period of the submission. This submission must include an attachment on company letterhead requesting the confidentiality of the submission per the below rule.

Per 19.15.7.15 NMAC; An operator shall file with the division a complete form C-104 to request the division assign an allowable to a newly completed or re-completed well or a well completed in an additional pool or issue an operator authorization to transport oil or gas from the well.

Per 19.15.7.16 NMAC;

- A. Within 45 days following the completion or recompletion of a well, the operator shall file form C-105 with the division accompanied by a summary of special tests conducted on the well, including drill stem tests. In addition, the operator shall file a copy of electrical and radio-activity logs run on the well with form C-105. If the division does not receive form C-105 with attached logs and summaries within the specified 45-day period, the division shall withhold the allowable for the well or suspend injection authority, as appropriate, until the operator has complied with 19.15.7.16 NMAC.
- C. The division shall not keep form C-105 and accompanying attachments confidential unless the well's owner requests in writing that the division keep it confidential. Upon such request, the division shall keep these data confidential for 90 days from the date of the well's completion, provided, however, that the report, logs and other attached data may, when pertinent, be introduced in a public hearing before division examiners.

Per 19.15.7.13 NMAC; An operator shall file amended form C-102 in the event there is a change in the information the operator previously submitted...

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C-104 Completion Packet Submissions

- **Prerequisite Submissions:**
 - Approved APD
 - Spud Notice
 - 103A (Change of plans) if applicable
 - 103N for all strings of well
 - 104RT (test allowable) if applicable
 - All Logs ran submitted to OCD

- **C-104 Completion Packet**
 - List of required attachments:
 - C-104
(required for all submission types)
 - C-102 As Drilled
(required for all submission types)
 - C-105
(required for C-104NW, C-104RC, and C-104CT)
 - Directional Survey or Deviation Survey If well is vertical/deviated.
(required for C-104NW and C-104CT)
 - If the well is Federal, attach the BLM approved version of the C-105
(required for C-104NW, C-104RC, and C-104CT)
 - If the well is Federal, attach the BLM approved version of the C-103
(required for C-104NW, C-104RC, and C-104CT)
 - Letter requesting confidentiality.
(required for C-104CT submissions)

 - List of additional attachments:
 - Wellbore schematic

- **Information needed on each file listed above:**
 - **C-104**

All information on this form is required since the update of the forms. Any information below that appears in red text **MUST** match previous submissions and OCD permitting or it will be rejected. If the information was previously submitted incorrectly, you must separately submit a C-103A requesting a “Record Clean Up” prior to submitting this form. The C-103A shall include which information was wrong, why it was wrong, and listing the correct information.

Note: If the well has multiple pool completions, then a C-104 is needed per pool.

 - Submittal type
 - Operator name
 - OGRID
 - Property name & well number
 - Property code
 - Mineral Owner

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C-104 Completion Packet Submissions

- API #
 - Pool name
 - Pool code
 - Surface Hole Location
 - All items in Section 3 Completion Information
 - ❖ (If C-104 RT this section may be estimates)
 - Action Ids and Order Numbers Section
 - ❖ Action ID numbers for each string need to be listed, if the sundries were submitted prior to OCDs Action ID system list as “Previous to system” and answer “yes” to the bottom left column.
 - ❖ Yes or no must be checked for each order type if yes is selected then the order number must be listed, or the submission will be rejected.
 - Operator Signature Box
- **C-102 As Drilled**
- The C-102 as drilled is critical in ensuring completions meet the OCD requirements for spacing and setbacks. An example of a C-102 is below for reference on what OCD would like to receive as far as quality.
- Note: If the well is completed in more than one pool, provide a C-102 for each pool.
- All information on the form is required.
 - Must list defining well API # if NOT the defining well.
 - Plat area
 - ❖ Ensure no major changes to the wellbore location, this submission will be compared to the APD and any change of plan sundries.
Note: If wellbore has deviated outside of previously approved HSU, an NSL order number will need to be provided on the C-104 main form and C-102 order number box.
 - ❖ Latitude and Longitude must be to 5 decimal places.
 - ❖ Perimeter of spacing unit must be identified clearly (Figure 1)
 - ❖ Wellbore must be identified clearly (Figure 1)
 - ❖ C-102 needs to be signed and certified by the operator (Figure 1), unless the SHL changed then a surveyor also needs to sign and certify.
 - ❖ First and last take points must be identified clearly and footages from HSU boundaries displayed (Figure 1)
- **C-105**
- The C-105 is to be included for any C-104NW, RC, or CT submission. All information on this form is required since the update of the forms and any information below that appears in red text **MUST** match previous submissions and OCD permitting or it will be rejected.
- Submittal type
 - Operator name
 - OGRID
 - Property name & well number

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C-104 Completion Packet Submissions

- Property code
- Mineral Owner
- API #
- Pool name
- Pool code
- Surface Hole Location
- Bottom Hole Location
- All of Section 3 must be completed.
- All of Section 4 Action Ids and Order Numbers Section
 - ❖ Action ID numbers for each string need to be listed, if the sundries were submitted prior to OCDs Action ID system list as “Previous to system” and answer “yes” to the bottom right column.
 - ❖ Yes or no must be checked for each order type if yes is selected then the order number must be listed or the submission will be rejected.
- Section 5 Test Data must be fully completed, and volumes must be on a 24-hour scale. If the test was shorter than 24 hours the volumes need to be projected for a 24-hour test.
- Section 6, Must have one of the boxes checked and associated lat/long as necessary.
- Formation Tops, Operator must include tops (MD and TVD required) for all formations that they drilled through and must indicate whether they encountered any Water, Oil, or Gas zones.

Note: C-105s that are missing formation tops that were drilled through will be rejected.

○ **Directional Survey/Deviation Survey**

Note: A survey must be attached to the submission, a vertical/deviated well may use either a directional or deviation survey.

- Data points must be at minimum every 200’
- Survey must be entire length of the wellbore

○ **C-103 Completion Sundry:**

Historically OCD required a C-103 completion sundry which had information about completion activities. This information has been moved to the updated C-105 and the completion sundry is no longer required by OCD for a C-104NW review. If the well is a recomplete a sundry with work details shall be submitted with the C-104RC submission.

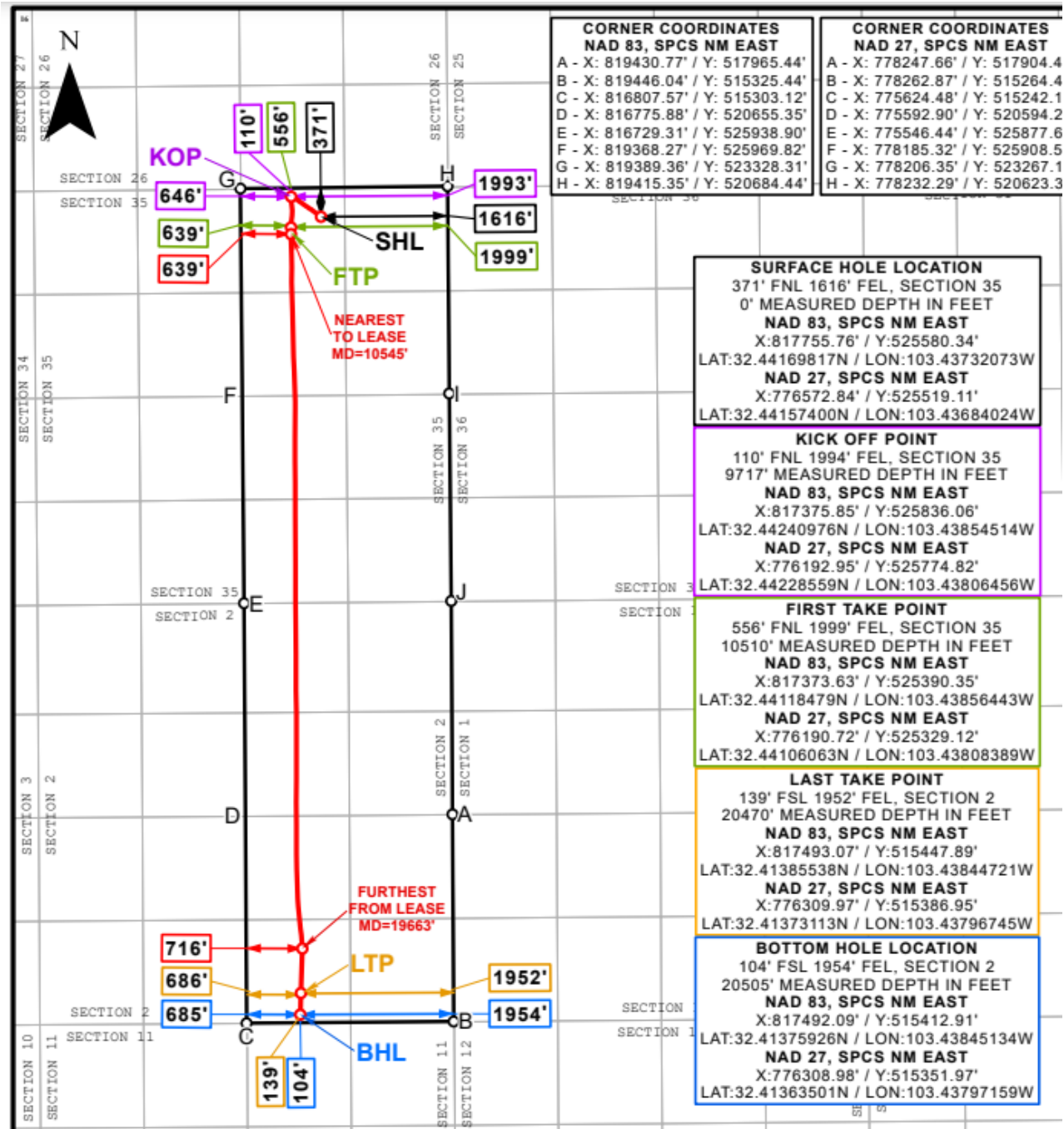
○ **C-105 Completion Report and C-103 Completion Sundry If federal**

If the well is federal, the BLM approved equivalent of the C-105 and C-103s shall be submitted in lieu of the OCD forms.

Note: If the well is federal, sundry must be approved by BLM before submitting to OCD or per 19.15.7.9 C (1) NMAC allows the operator to submit the state equivalent in lieu of the BLM approved sundry if the sundry has not been approved by BLM after 30 days.

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Distances/areas relative to NAD 83 Combined Scale Factor: 0.99989656 Convergence Angle: 0.48093056°

Figure 1, Example C-102 As Drilled Plat