



EnergyMakers
Advisory Group

Texas Delaware Basin DMG SWD Permit and Performance Parameters



Backdrop to 3P Report (**P**ermit & **P**erformance **P**arameters)

EnergyMakers is Industry Consultant – Water Management, Water Treatment, Permitting, Subsurface Specialists, 30+ years in O&G

Have executed BHP pressure surveys across Texas – every basin, every formation - since 2014 (going back to the 1960's!)

Subsurface research specialists; subsurface issues & communications for landowners and mineral owners, forensic due diligence on cause and effect

Extensive research on Seismicity relationship to Pressure & Operational Regimes

Apply findings to permit strategies for our clients – finding safe, well-performing SWD locations

Opinions in this presentation are our own, and do not reflect, in any way, opinions of the Texas RRC.

Status of Texas RRC Permian SWD Review Policies

TX RRC Presented Proposed Concepts to Industry Dec 3, 2024, Industry Feedback solicited

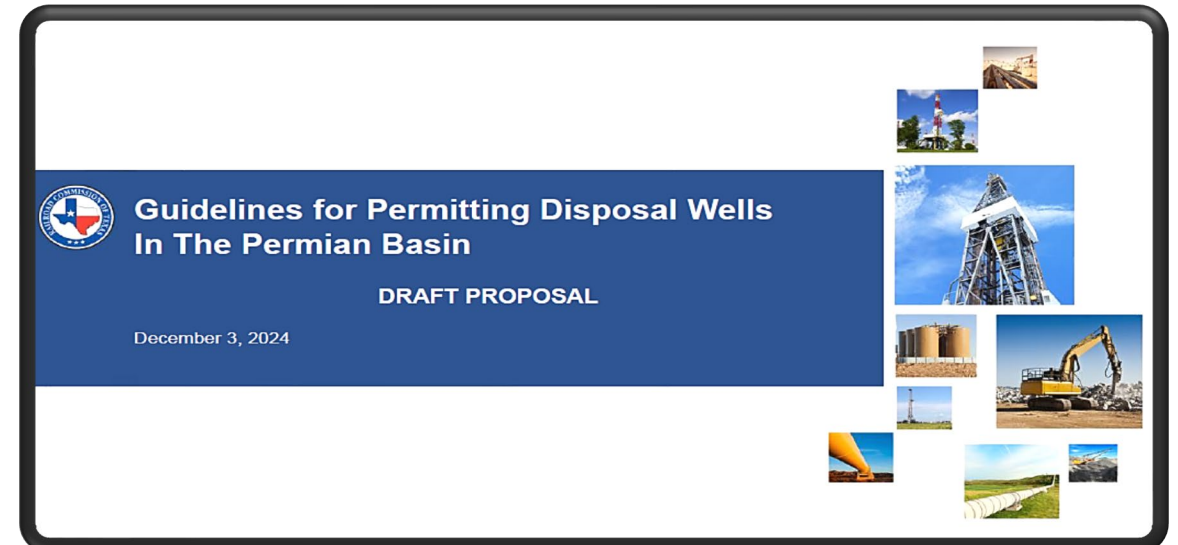
Official feedback rounds January and March, '25

Final policies / notice to operators published May 15, '25

Review Policies implemented June 1, 2023

Proposal applies to:

- Permian Wells
- Newly Permitted Wells only



125 Parameters include Texas RRC Algorithms, ea. Block

A			B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	
For an AOR Well: (0.25 MILE "RULE")			Affirm	Not Affirmed			PROGRAM INPUTS ARE IN LIGHT BLUE		WB_14B2_FLAG	YES		B3	B4							CALCULATIONS FOR VOLUMETRIC AND INJECTION RATE			
- Cement thru injection zone			PASS	FAIL		1.00	MILE AOR		WL_14B2_FLAG	NO		YES	YES									2,176	psi
- Casing thru injection zone			PASS	FAIL		0.10	MAX MBHIP REDUCTION		WL_14B2_CODE			NO	NO									2,045	psi
- Plugs isolating injection zone			PASS	FAIL		100%	PERCENTAGE OF FRACTURE GRADIENT ALLOWABLE		WL_14B2_DIST_SF													20,000	BWPD
						5	YEARS TO CALCULATE CUMULATIVE VOLUME INJECTED IN AOR		WL_14B2_DIST_SF_CLNUP													5	YEARS
									WL_14B2_DIST_ST_PLG													36,500,000	BBL
FROM CONFINEMENT CALCULATIONS: GREEN= CONFINED RED= NOT CONFINED								VALUES IN BLUE CELLS ARE DIRECTLY FROM RAD RESPONSES	WL_14B2_EXT_STATUS													2,510	feet
ARE THERE WELLS IN AOR WITH NO WELL DATA?			NO			2,510	(FT) ZONE THICKNESS FROM RAD RESPONSE		WL_14B2_FLOODPS_HOLD													1.00	MILE
ARE THERE WELLS IN AOR THAT MEET ANY OF THE FOLLOWING CRITERIA:			NO			3,248	(FT) TOP OF PERMITTED INJECTION INTERVAL FROM RAD RESPONSE		WL_14B2_GOOD_FAITH													5,280	FEET
PLUGGED WELLS						*****	(BWPD) INJECTION RATE BWPD FROM RAD RESPONSE		WL_14B2_H15_DELQ													87,582,577	FT^2
UNPLUGGED, AND AT LEAST 1 OF THE FOLLOWING						0.67	(PSHIFT) FRACTURE GRADIENT FROM RAD RESPONSE		WL_14B2_H15_PROB													2,198,32E+11	FT^3
INACTIVE WELL PROVISIONS (RULES 14 AND 15) - WB_14B2_FLAG						0.63	(PSHIFT) PORE PRESSURE GRADIENT FROM RAD RESPONSE		WL_14B2_MECH_INTEG													15%	
NO ACTIVE OPERATOR - WL_14B2_OPER_DELQ						15%	POROSITY FOR VOLUME CALCULATIONS		WL_14B2_OPER_DELQ													3.00E-06	1/psi
ORPHAN WELL LIST									WL_14B2_PLG_ORD_SF													*****	FT^3
									WL_14B2_POLLUTION													5,872,634,034	BBL
									WL_14B2_WELL_OTHER													131	psi
ALL WELL SEARCH IN AOR: LARGEST OVERALL ASSESSMENT VALUE =			148			148	OVERALL AOR ASSESSMENT VALUE															1,266	BWPD
(1/DISTANCE FROM INJECTION WELL) * AGE OF WELL * (1/DATA QUALITY IMPAIRMENT)						131	(PSI) INCREASE FOR 5 - YEARS OF INJECTION															5,872,634,034	BBL
MBHIP reduction due to AOR review						0.00																	
						0.040	(PSHIFT) INCREASE FROM 5 - YEARS OF INJECTION															2,310,764	BBL
						0.670	(PSHIFT) FINAL PORE PRESSURE GRADIENT															5,874,944,798	BBL
						0.26	(PSHIFT) ESTIMATED MSIP USING ESTIMATED FRICTION PRESSURE															99.96%	
																						0.04%	
														</									

3P Report: a Rapid Screening Toolkit organized by Topic

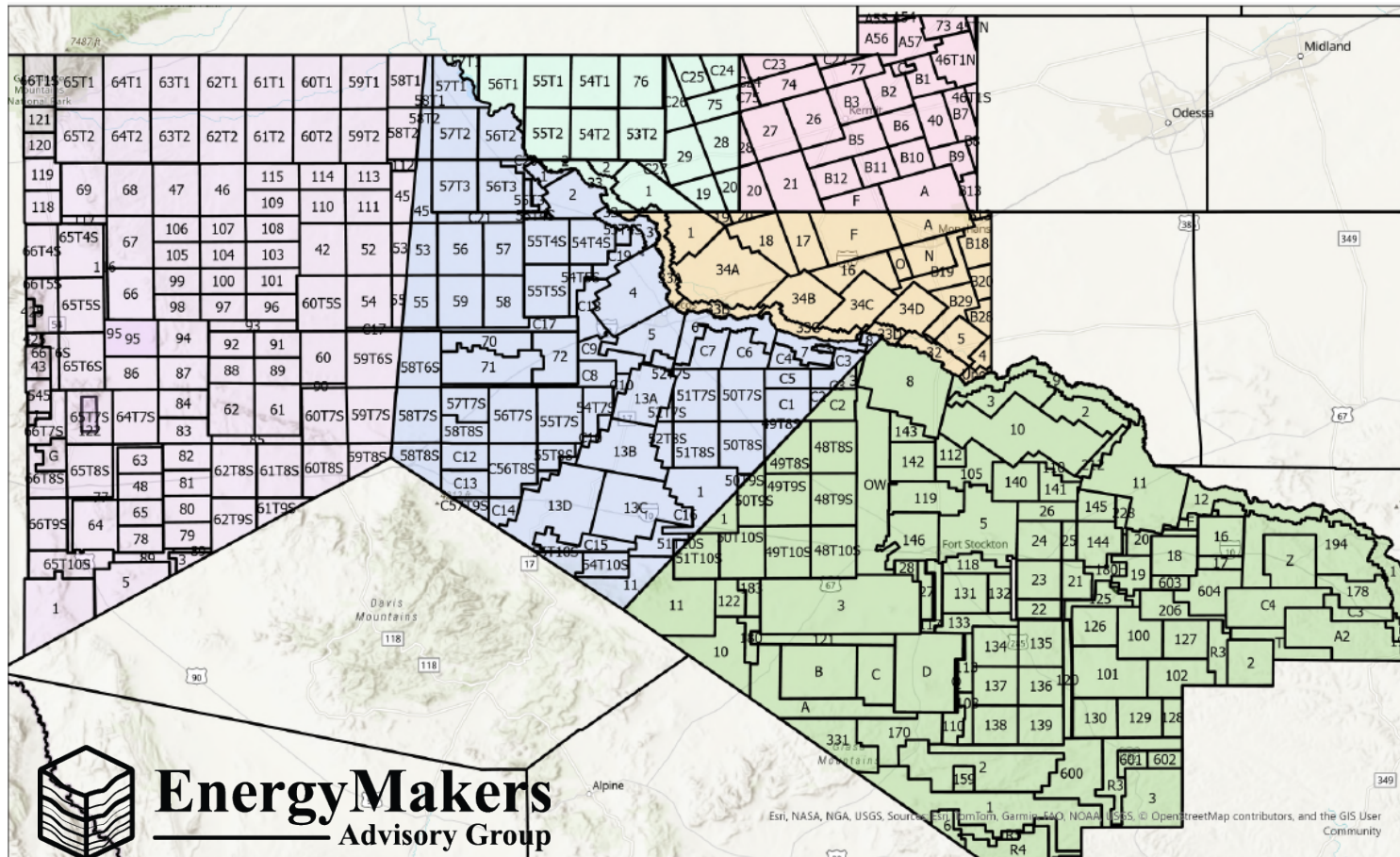
- **SWD Permit and Performance Feasibility**
- **125 Parameters / Calculations per Block**

Permit and Performance Parameters

Chapter Headings	Number of Parameters	Number of Maps
A Metadata	14	1
B Fracture Gradient	7	7
C Bottomhole Pressure Gradient	17	17
D Surface Pressure Gradient	9	1
E Penetration Data Completeness	21	15
F 1/2 Mile Radius of Review (Block Statistical, RRC Reqs)	4	4
G 2 Mile Radius of Review (Block Statistical, RRC Reqs)	9	8
H Protection of Injection Interval (Custom)	Custom	Custom
I Protection of Freshwater	12	7
J Environmental Risks & Considerations	19	17
K SWD Performance Indicators	33	10
L Performance MDIV Calculations	4	4
M Performance MSIP Calculations	11	4
N FIX Voluntary Well Remediation Indicators	6	6
O Confinement Intervals / (Custom Option)	4	Custom

Permit & Performance Feasibility Parameters

- ✓ Statistics (planning)
- ✓ Location ID /Screening/Risking (focus)
- ✓ Permitting & Compliance Data Packages/ (permitting)



	Total Block Count	Blocks with SWD
Culberson	117	14
Loving	22	20
Reeves	82	58
Ward	28	13
Winkler	35	7
Pecos	103	14
	387	126

Average Block size is
2.5 X larger than a 2
Mile radius AOR

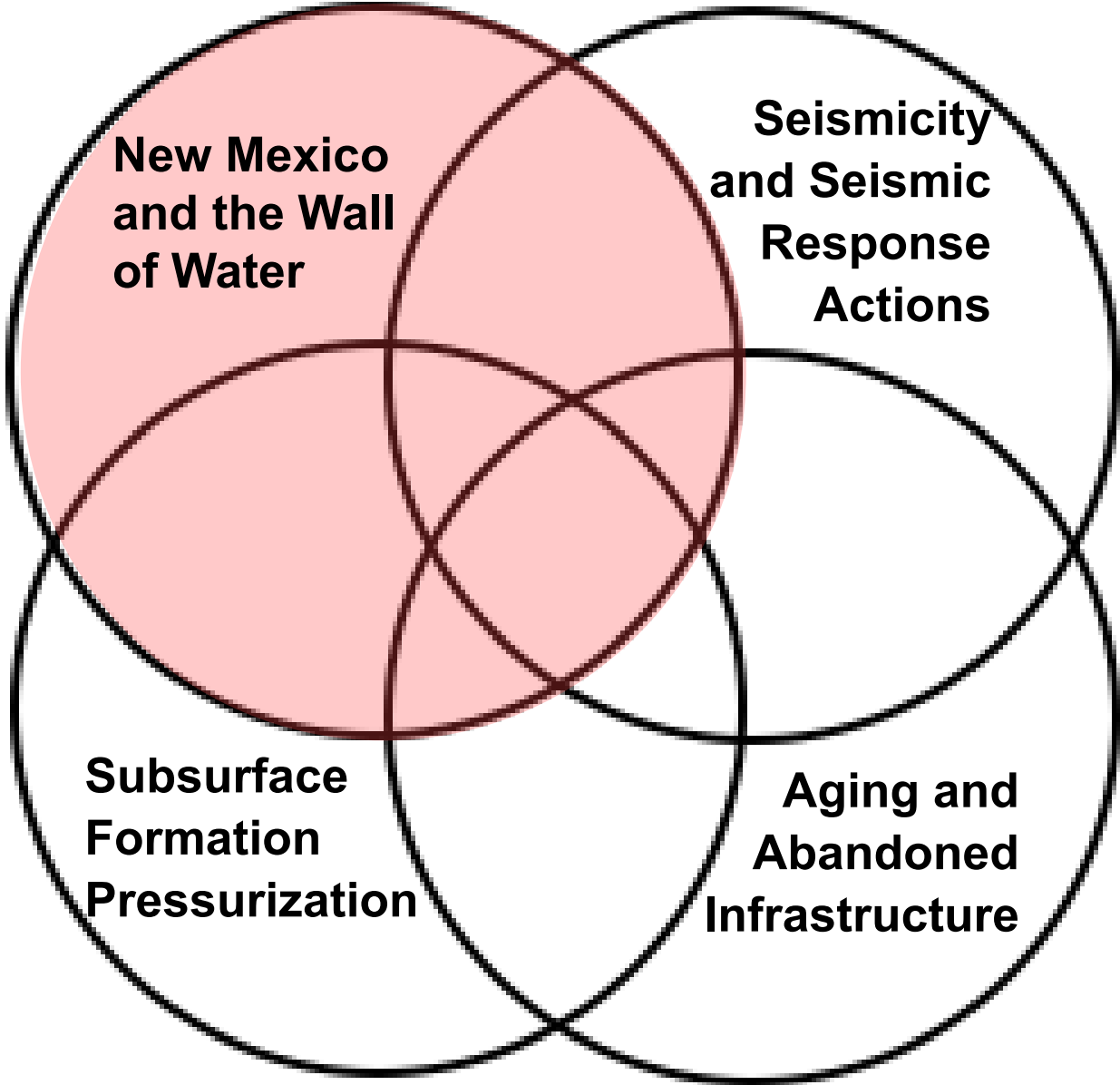
But First...a little background

How did we get where we are today?

What were the drivers?

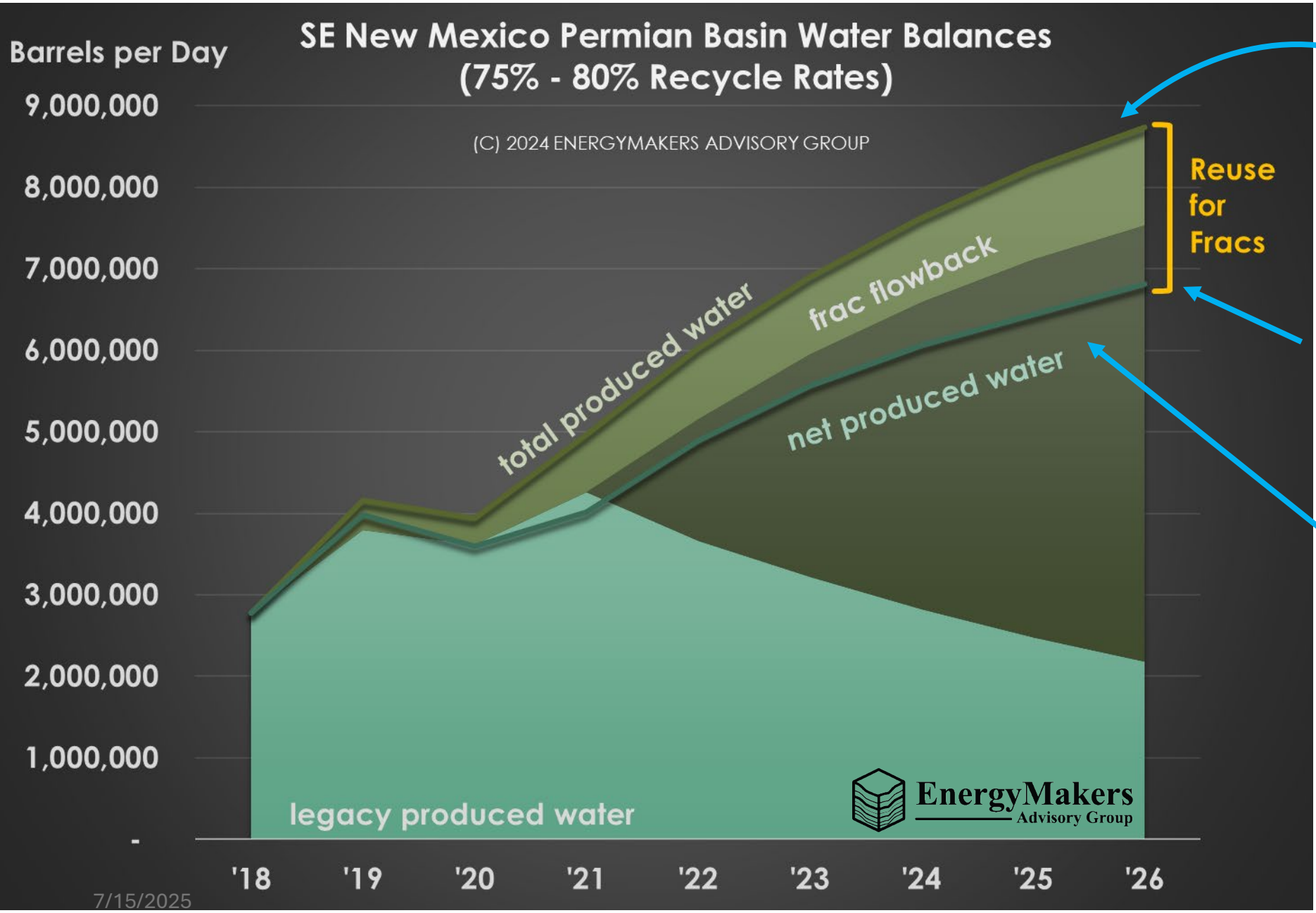
How do these “risks” relate to each other?

**Subsurface
Environmental
Risk Factors in
the Permian**



A dramatic, high-contrast image of a massive, curling blue-green wave crashing over a sandy beach. The wave's crest is white with foam, and the water below is a deep, swirling blue-green. In the foreground, a sandy beach is visible, with a single orange starfish lying on it. The sky is a pale blue with wispy white clouds.

The Wall of Water Coming from New Mexico to Texas



“Wall of Produced Water”
co-produced with Oil and
Gas (O&G) in SE New
Mexico

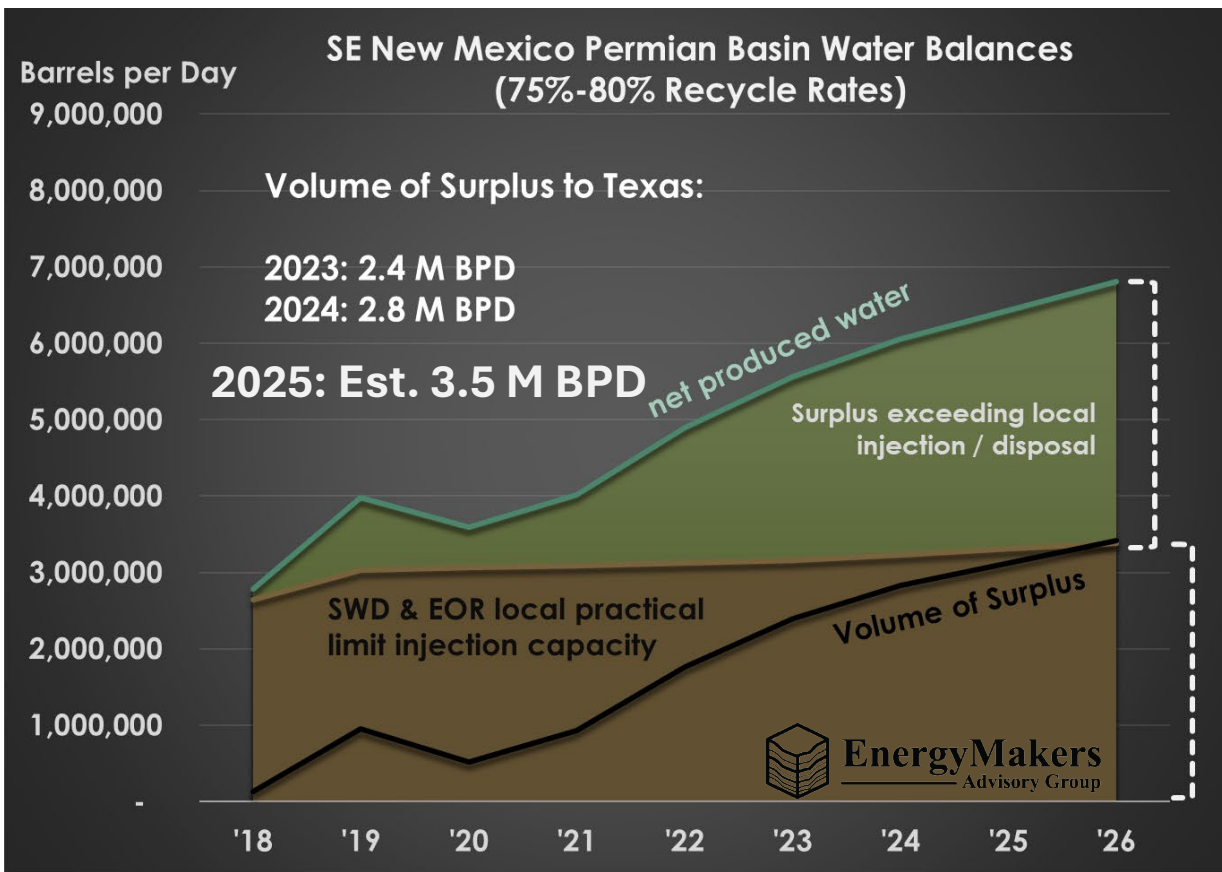
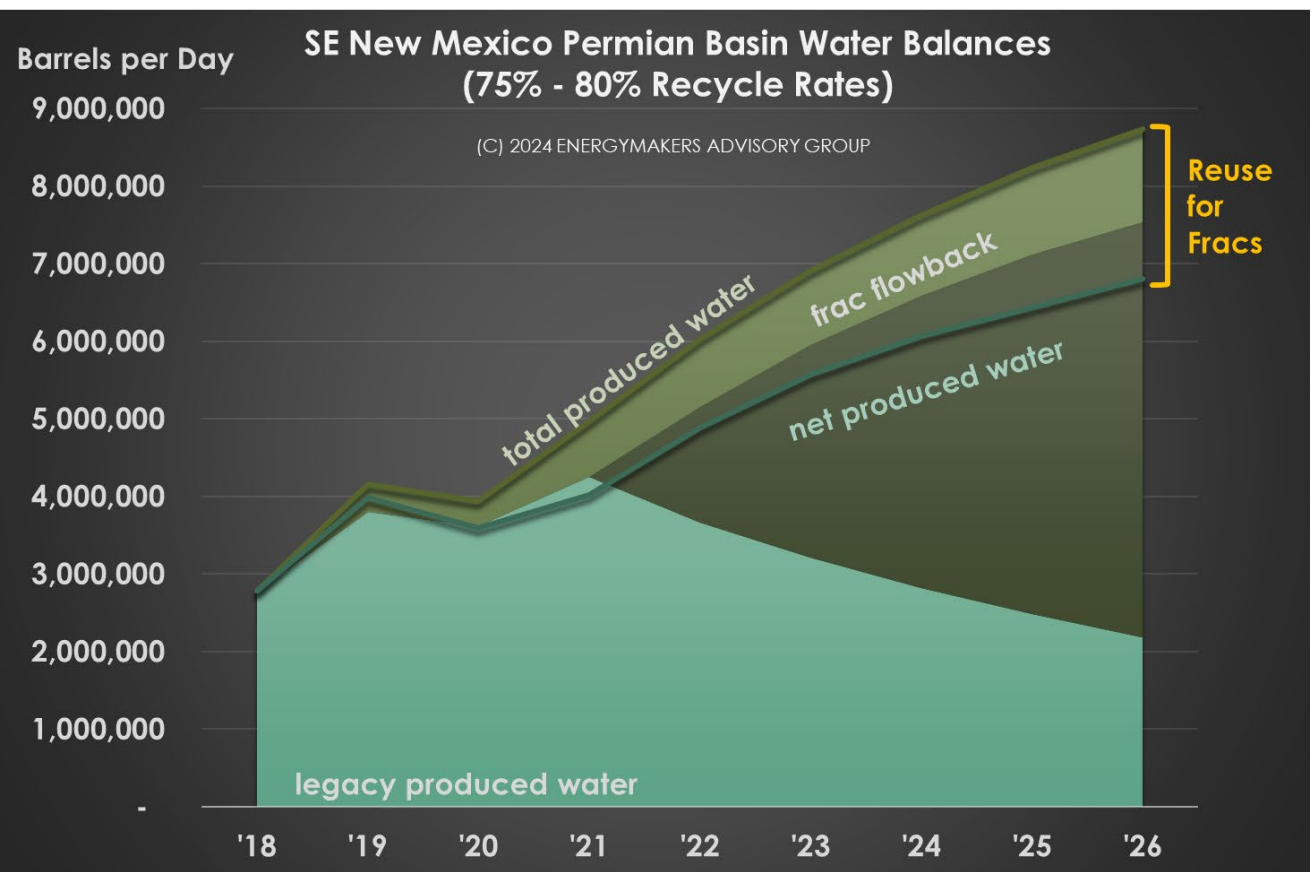
Recycling Reuse in O&G
will consume ~ 20% of
PW

“Net Produced Water”,
after recycling, is surplus
PW that must be:

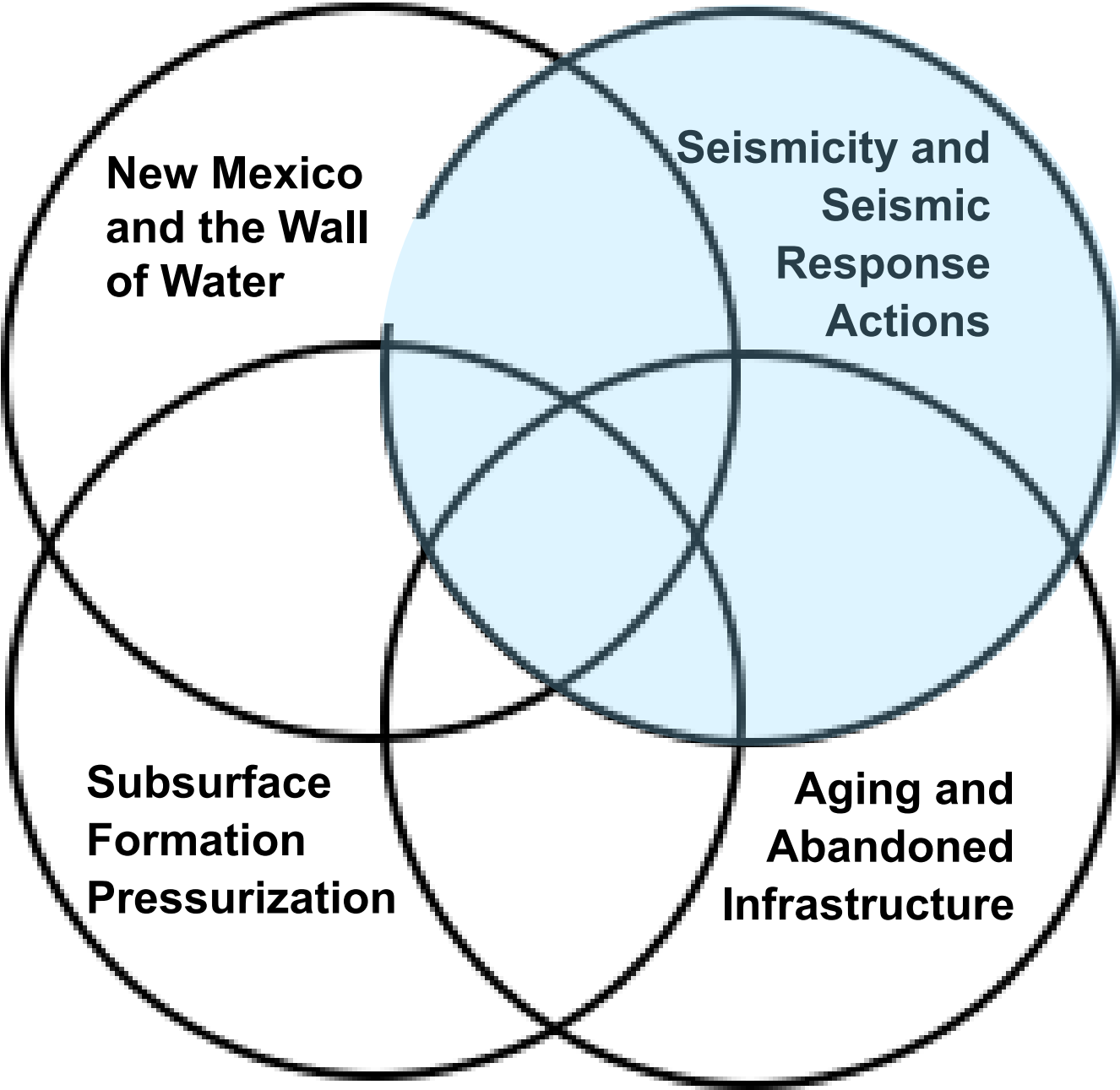
- Injected Underground
- Piped out of Area
- Find an Alternate
Beneficial Use

After we have recycled all we can use in Oil and Gas....

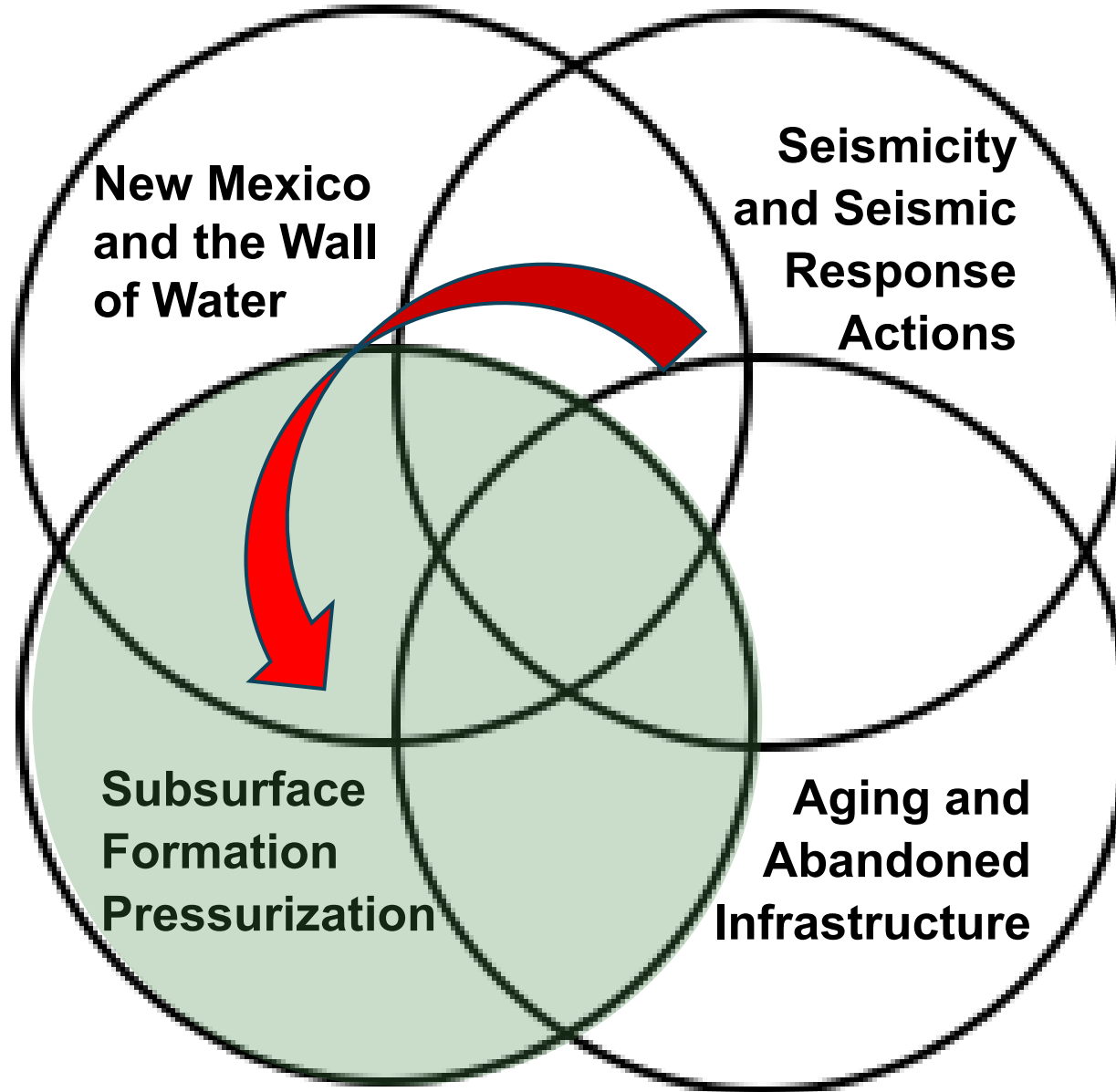
...the left over Net Produced Water (PW) needs an outlet. Currently, SWD & EOR injection are the primary outlet. SWD and EOR growth is increasingly limited, leaving a growing surplus (black line).



**Subsurface
Environmental
Risk Factors in
the Permian**



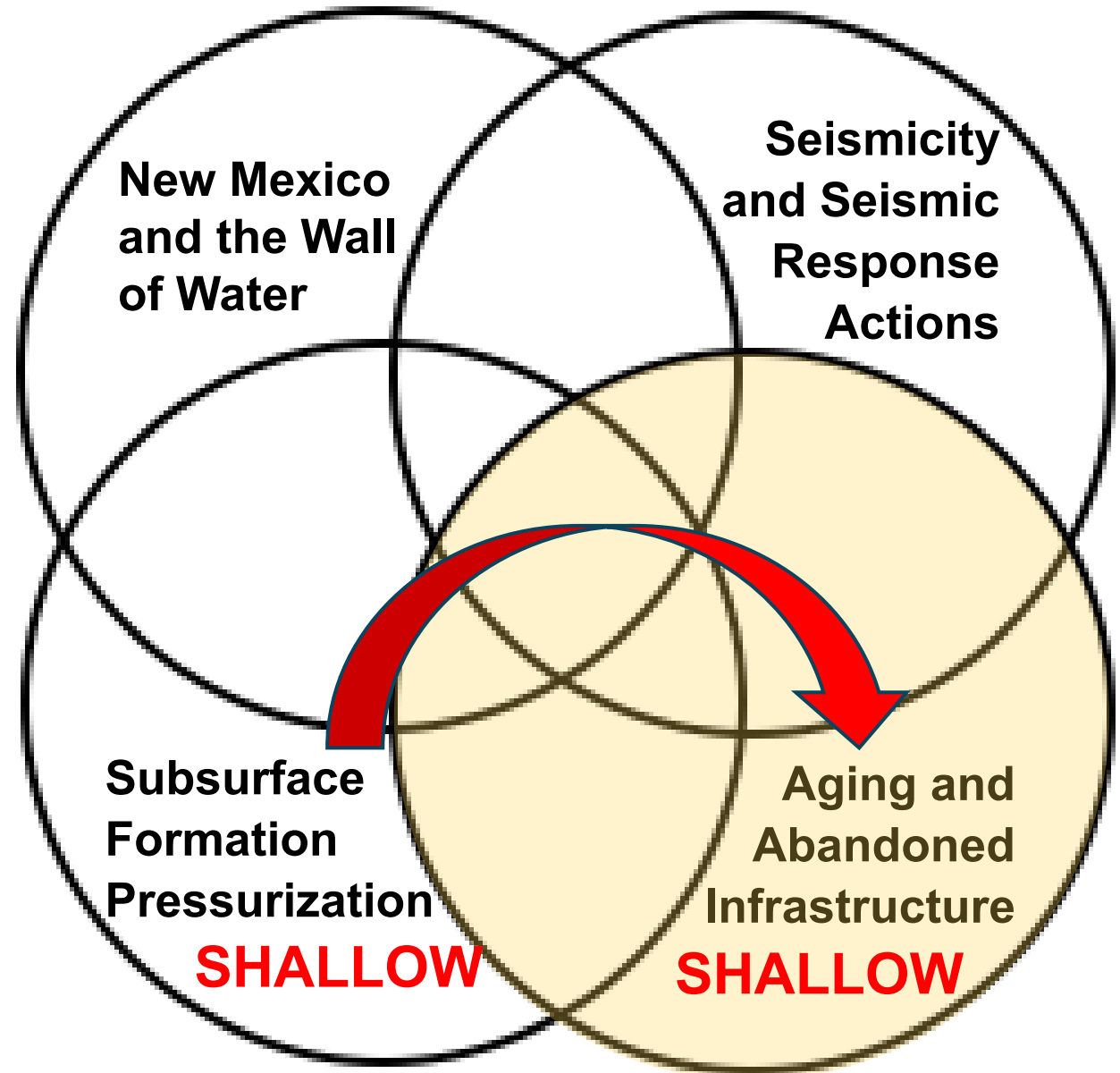
SHALLOW FORMATIONS ARE OVERPRESSURED & INCREASING IN PRESSURE

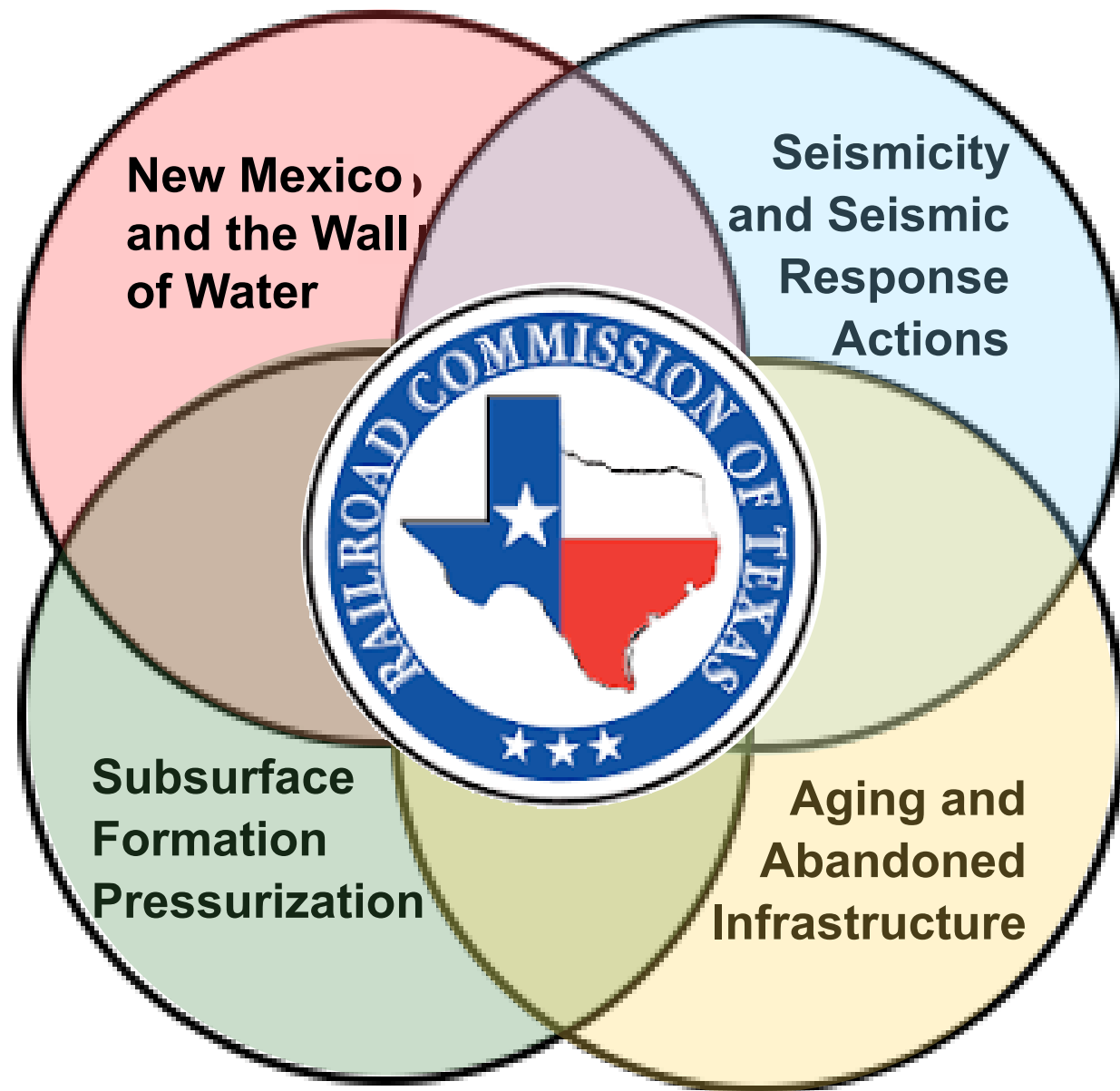
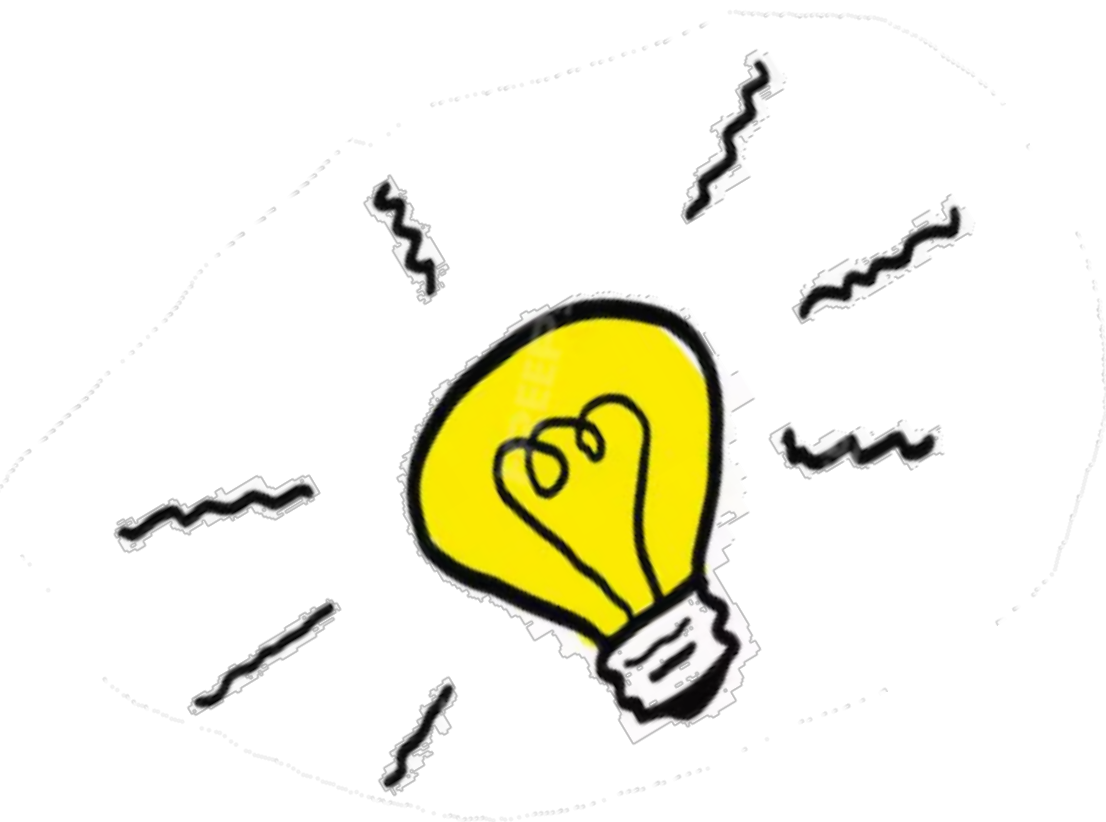


DEEP SRA BANS RESULTS IN PW REDIRECTION TO SHALLOW SWD

Orphan Wells and Aging Infrastructure

- Orphan wells can be shallow, leaky subsurface pollution conduits.
- Aging infrastructure and compromised integrity means they were not built for today's pressures.
- The vast majority of Orphan wells are in old shallow EOR fields.
- Orphan wells can be close to **groundwater** and **freshwater** formations





Texas RRC “Raising the Bar” for new Permian SWD Permits



(EnergyMaker’s synopsis of proposed new permitting concepts under discussion)

Ch Ch Ch Ch Changes.....

Expanding the AOR : ¼ mile to 2 miles

Limited by local Frac Data

Limited by local & projected Operating BHPs

Daily/Monthly Reporting and Submission

Reduce exposure to:

- Freshwater contamination
- Leaky /compromised nearby wells
- Unconfined intervals
- Old Wells / compromised infrastructure
- “unknown unknowns” (missing data)

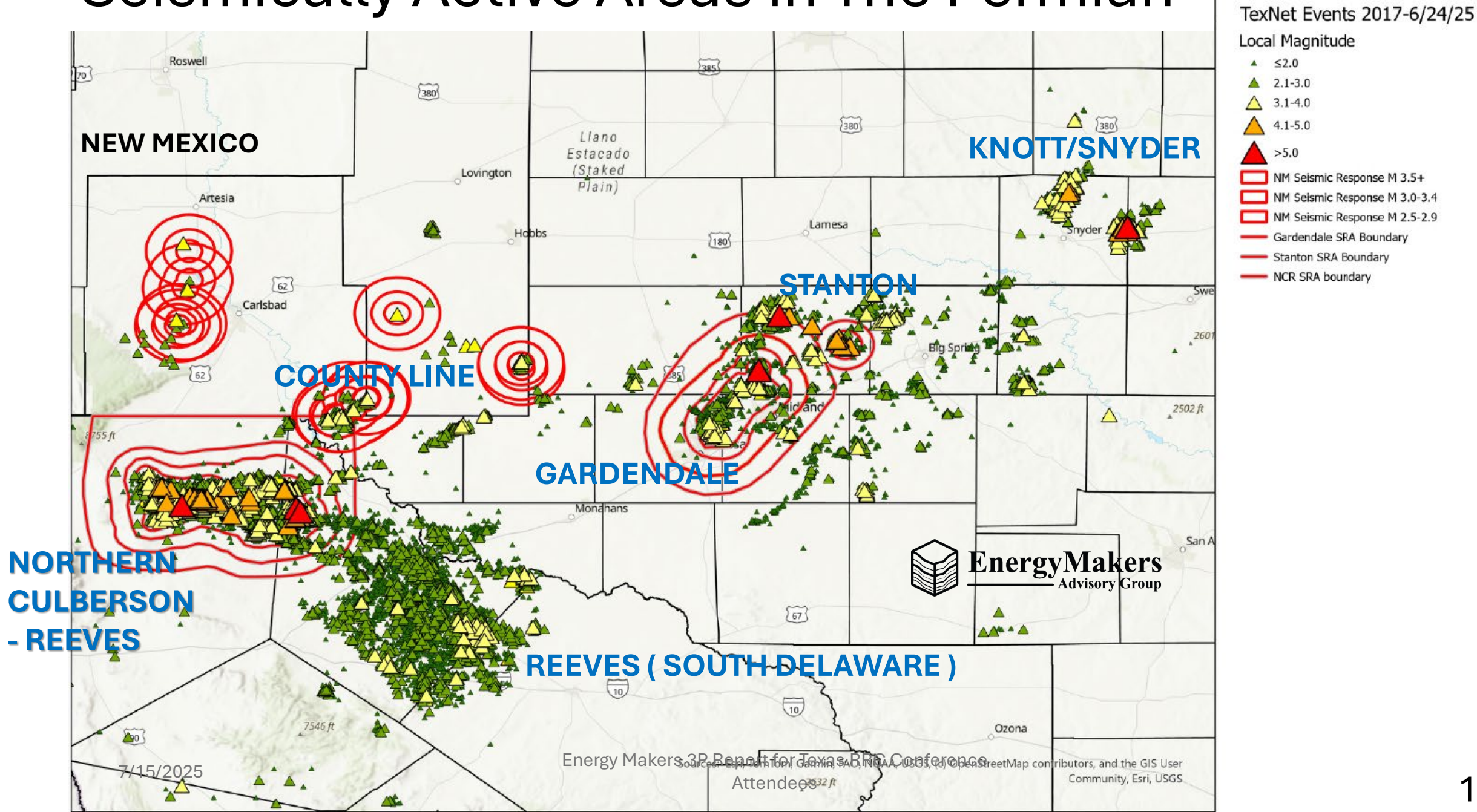
- Will regulate shallow SWD mainly on pressure (BHPs)
- Will regulate deeper SWD wells based on seismic risk



Background: Understanding Induced Seismicity is..... “Complicated”



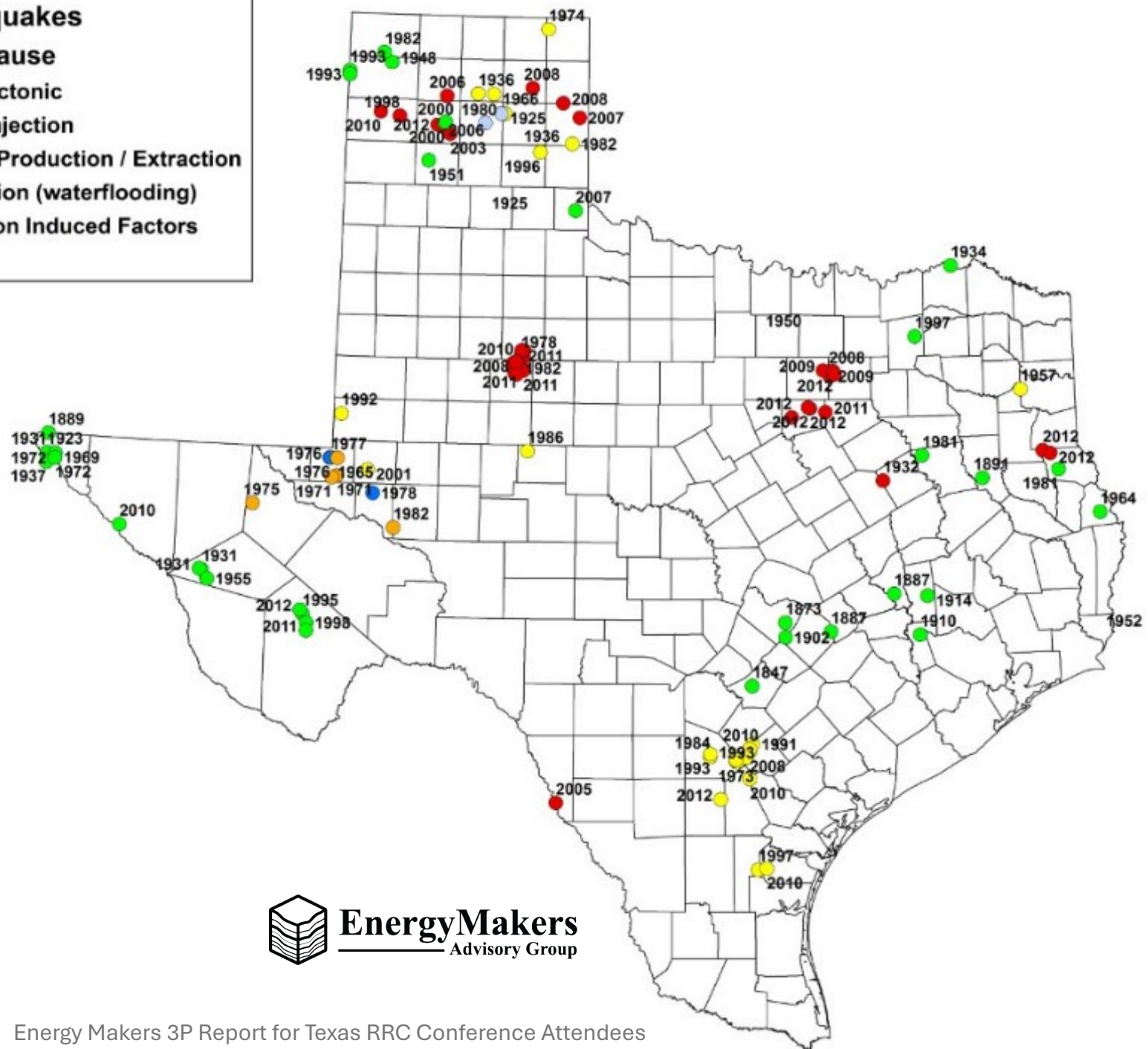
Seismically Active Areas in The Permian



Texas Earthquakes

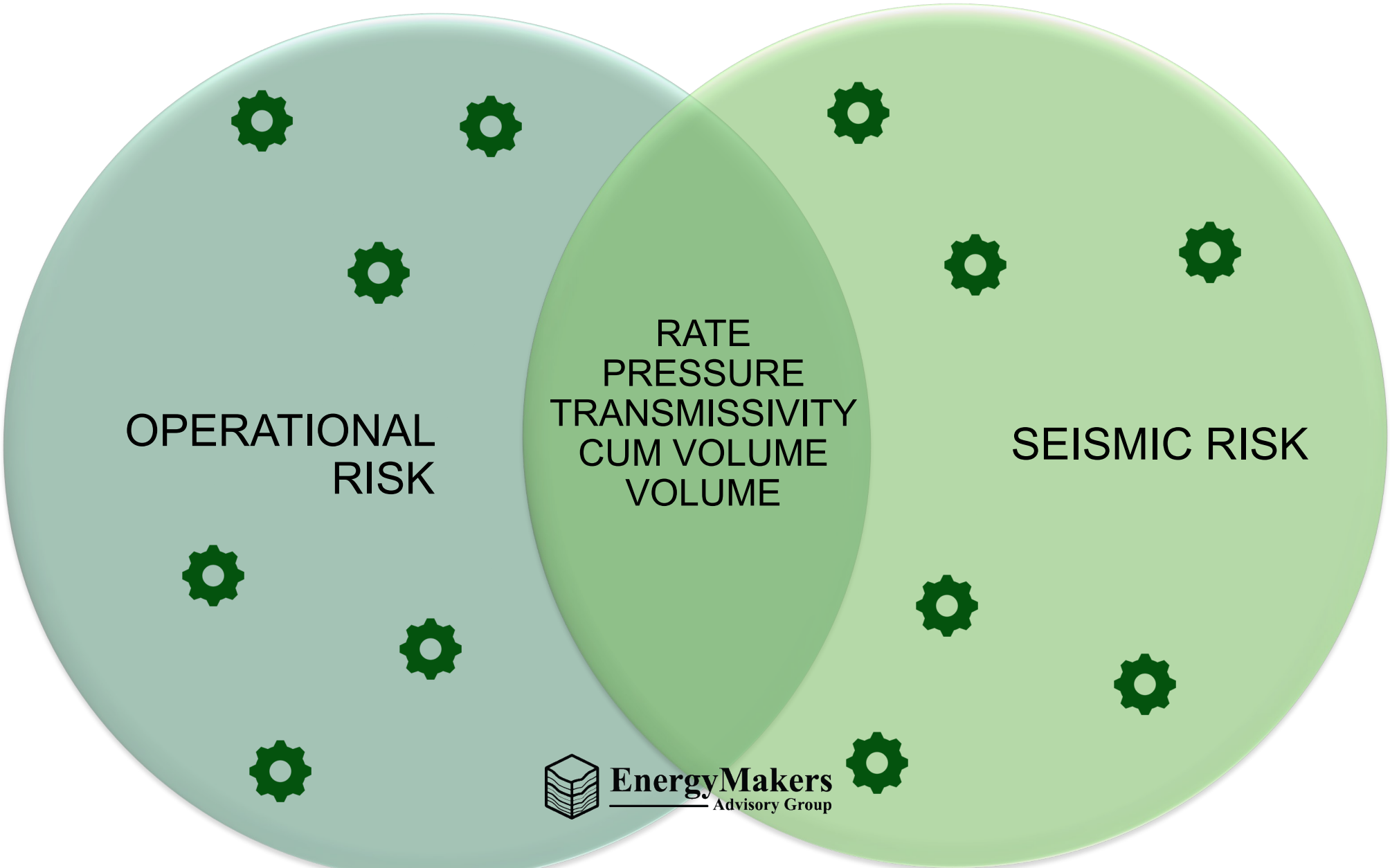
Earthquake Cause

- Natural/ Tectonic
- Disposal Injection
- Oil or Gas Production / Extraction
- EOR injection (waterflooding)
- Combination Induced Factors
- Unknown



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Pressure Problems are different than Seismic Problems



Contributors to Induced Seismicity are multifaceted and complex

Reservoir Conditions Ex:

- Presence and proximity to faults and fault networks
- Fault orientation relative to local stress fields
- Pore pressure and pathways
- Fault friction and structure, etc.
- Rock Strength / Brittleness
- Temperature
- Pathways to deep basement faults
- Fluid / pressure balance in reservoir

Formation Permeability Ex:

- Can be complex:
- Higher permeability formations provide more pathways for fluid/pressure transmission and dispersion,
- Higher permeability faults can allow pore pressure diffusion to be channeled long distances, and
- Lower permeability faults can serve as a bottleneck allowing stress to accumulate

Injection Parameters Ex:

- Cumulative injected volume
- Injection rate
- Injection pressure
- Fluid temperature
- Injection depth
- etc.

Prevailing Wisdom about Induced Seismicity....



Doesn't always prove to be true
when you look at the data.

See Presentation Details at Conference:

Claim #1: “***High Local SWD Volumes Induce Seismicity***”

Claim #2: “***Deep SWD Volumes Induce Seismicity***”


Claim #3: “***High Pressures Induce Seismicity***”

Midland Basin Bottomhole Pressures (psi/ft) by County and Depth Interval - 2021

BottomHole Pressure Gradient PSI/FT ≤0.5 0.50-0.60 0.60-0.70 0.70-0.80 0.80-0.90 0.90 +

Texas RRC
References for
Environmental
Concerns

	Can Flow to Surface	Moderate risk to USDW	Elevated risk to USDW	Likely Fracture Initiation	Fracture containment issues	

	Midland Basin Counties Avg. Bottomhole Pressure Gradient / County (psi/ft)																										
Ft. Subsurface	County A	County B	County C	County D	County E	County F	County G	County H	County I	County J	County K	County L	County M	County N	County O	County P	County Q	County R	County S	County T	County U	County V	County W	County X	County Y	County Z	County ZZ
-							0.61									0.81		0.92	0.97	0.67	0.84						0.99
1,000	0.78	0.46	0.46	0.87	0.72		0.85		0.93						0.81	0.88	0.88	0.75	0.71	0.76		0.83		0.69			0.74
2,000		0.59					0.85		0.79		0.61			0.77	0.60	0.80	0.83	0.74	0.62	0.76	0.73	0.52		0.57	0.60		0.63
3,000	0.91	0.66	0.73	0.74		0.66	0.68	0.64	0.73	0.93	0.64	0.67	0.71	0.75	0.62	0.78	0.83	0.56	0.65	0.76	0.70	0.65	0.71	0.69	0.66	0.65	0.52
4,000	0.77	0.74	0.70	0.80	0.74	0.69	0.59	0.64	0.68	0.71	0.63	0.67	0.66	0.65	0.54		0.75	0.65	0.57	0.75	0.68	0.70	0.69	0.64	0.66	0.60	0.88
5,000	0.81	0.67	0.67	0.72	0.71	0.66	0.65		0.68	0.72	0.60	0.72	0.59	0.61	0.47		0.62	0.69	0.51		0.57	0.53	0.61	0.57	0.63	0.55	0.47
6,000		0.63	0.65	0.63	0.66	0.69			0.64	0.68	0.63	0.49	0.58	0.52	0.48	0.48	0.62		0.53	0.56	0.48		0.58	0.50	0.33	0.48	0.46
7,000		0.66	0.69	0.71			0.45		0.48	0.53	0.48	0.49	0.57	0.61	0.65	0.51	0.63	0.67		0.77		0.53	0.48	0.49	0.54	0.53	0.50
8,000		0.64	0.51	0.49		0.56	0.51			0.49	0.56	0.54	0.57	0.57	0.53	0.59		0.62		0.68		0.51	0.72	0.49	0.56	0.42	0.66
9,000		0.41		0.47						0.49	0.54		0.64	0.45	0.62					0.56	0.58			0.46		0.30	0.60
10,000		0.51		0.51						0.49	0.51	0.53			0.58						0.65	0.57	0.51		0.49	0.46	
11,000	0.47	0.35								0.47	0.45	0.57	0.45		0.45						0.60	0.60	0.48	0.58	0.46		
12,000		0.47	0.43							0.46	0.53	0.56				EnergyMakers Advisory Group					0.60		0.61	0.58			
13,000		0.44	0.47							0.49	0.54												0.59	0.56			

Earthquake Correlations to Pressures: Central Oklahoma

Central Oklahoma Counties: A Bifurcated Landscape

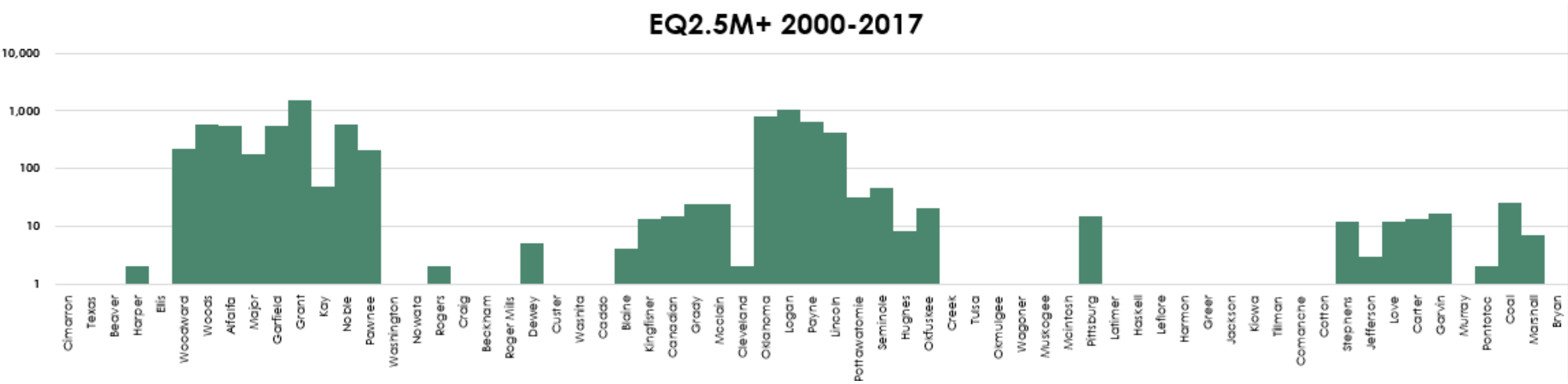


	CENTRAL OKLAHOMA																													
Injection Depth Range (ft)	Beckham	Roger Mills	Dewey	Custer	Washita	Caddo	Blaine	Kingfisher	Canadian	Grady	Mcclain	Cleveland	Oklahoma	Logan	Payne	Lincoln	Pottawatomie	Seminole	Hughes	Okfuskee	Creek	Tulsa	Okmulgee	Wagoner	Muskogee	Mcintosh	Pittsburg	Latimer	Haskell	Leflore
0-999	0.40									1.51					0.45	0.44		0.59	0.66	0.54	0.46	0.44	0.49	0.54	0.73					
1,000+	0.54	1.00	0.57		1.27	0.79			0.85	0.68	0.84	0.82		0.81	0.61	0.59	0.48	0.53	0.59	0.51	0.59	0.55	0.51	0.56	0.58		0.64	0.92	0.54	0.89
2,000+	0.44	0.86				0.78		0.99	0.81	0.61	0.56	0.61	0.62	0.56	0.51	0.54	0.54	0.52	0.51	0.51	0.51	0.45	0.50		0.60	0.56	0.64	0.95		0.63
3000+	0.64		0.81		0.93	0.69	0.63	0.69	0.48	0.57	0.63		0.55	0.55	0.53	0.52	0.50	0.50	0.51	0.50	0.46	0.47	0.50		0.62	0.66	0.66			
4000+	0.68	0.65	0.64	0.66	0.79	0.58	0.64	0.63	0.70	0.65	0.59	0.56	0.58	0.55	0.54	0.52	0.52	0.51	0.52	0.53	0.50		0.47						0.46	
5000+	0.56	0.66	0.61	0.52	0.70	0.57	0.60	0.59		0.61	0.70	0.59	0.52	0.54	0.51	0.49	0.54	0.52	0.48	0.47										0.48
6000+	0.44		0.61			0.53	0.60	0.56	0.64	0.65	0.61	0.54	0.54	0.53	0.52	0.49	0.48	0.50	0.54	0.51						0.56				
7000+			0.59			0.46		0.59	0.56	0.62	0.53	0.54	0.59	0.52	0.50	0.48	0.48	0.49	0.63	0.47							0.63			
8000+	0.57			0.67		0.61	0.44	0.50	0.56	0.62	0.59	0.55	0.55	0.52	0.50	0.50	0.48	0.48	0.72								0.58			
9000+			0.54			0.53		0.58	0.56	0.55	0.54		0.50			0.47			0.70											
10000+			0.53			0.54				0.62			0.48											0.48				0.51		
11000+													0.50						0.54											
12000+						0.56																								
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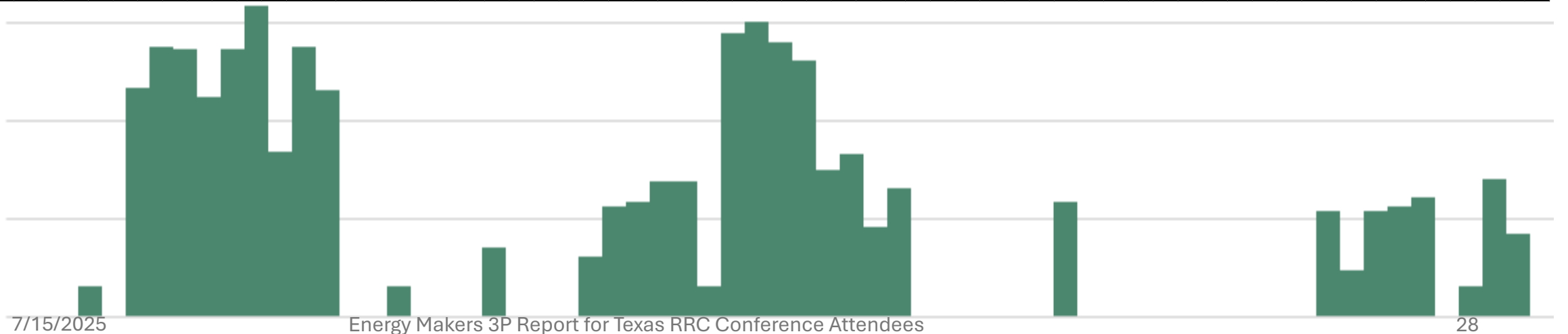
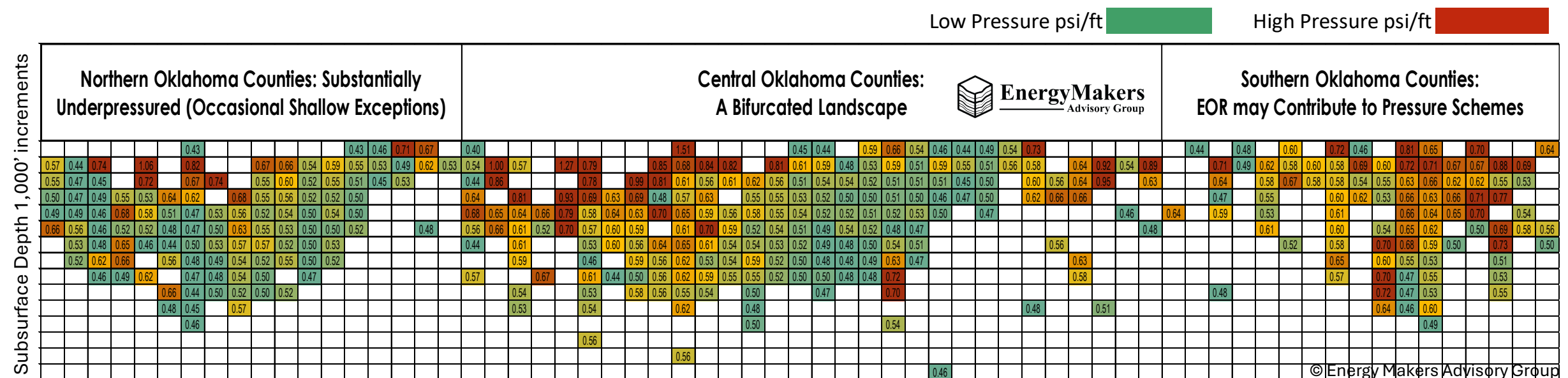
Earthquake Correlations to Pressures: State of Oklahoma

[illegible]

Earthquakes: State of Oklahoma, by County



Earthquake Correlations to Pressures: State of Oklahoma



Claim # 1: *Local Injection Volumes Drive Seismicity*

Development of complex patterns of anthropogenic uplift and subsidence in the Delaware Basin of West Texas and southeast New Mexico, USA

Peter Hennings^{a,*}, Scott Staniewicz^b, Katie Smye^a, Jingyi Chen^b, Elizabeth Horne^a, Jean-Philippe Nicot^a, Jun Ge^a, Robert Reedy^a, Bridget Scanlon^a

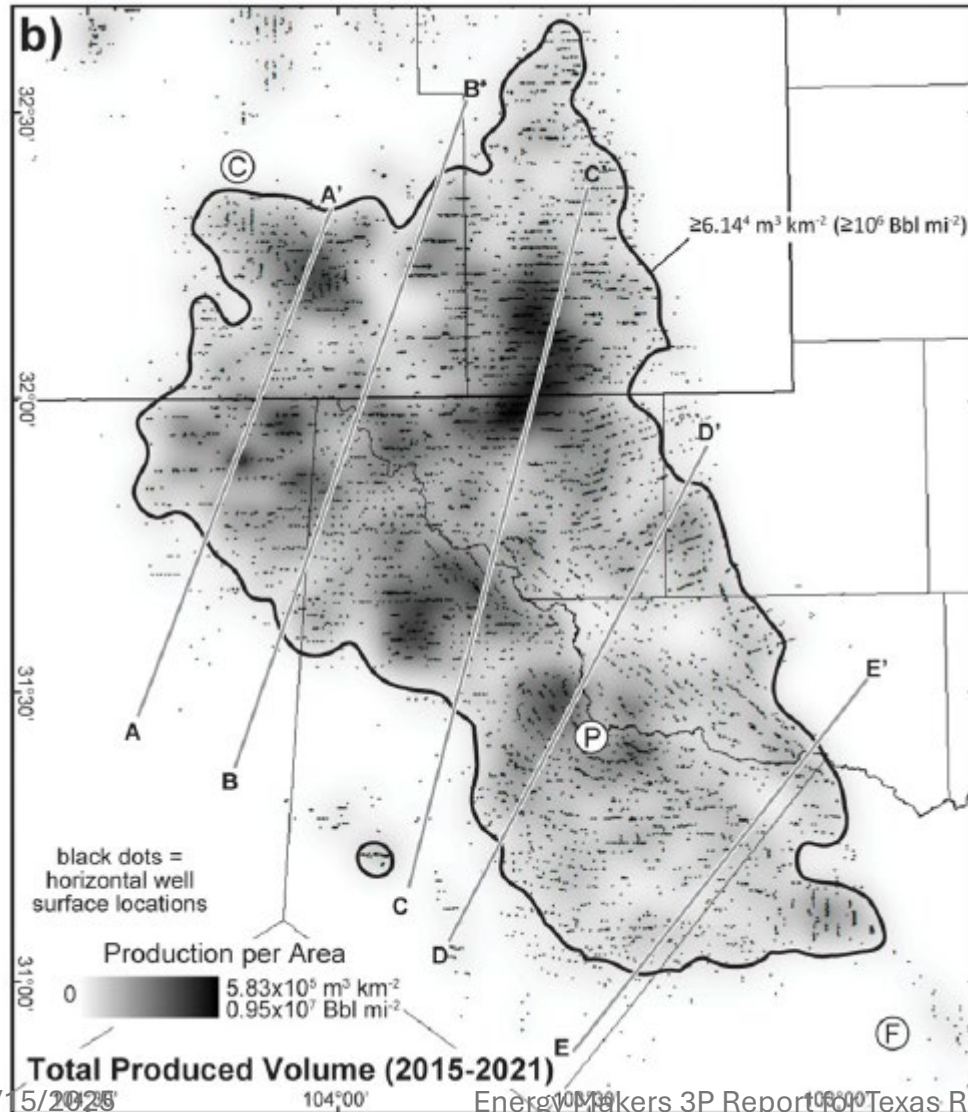
^a Bureau of Economic Geology, Jackson School of Geosciences, The University of Texas at Austin, P.O. Box X, Austin, TX 78713-8924, United States of America

^b Department of Aerospace Engineering and Engineering Mechanics, The University of Texas at Austin, Austin, TX 78713-8924, United States of America

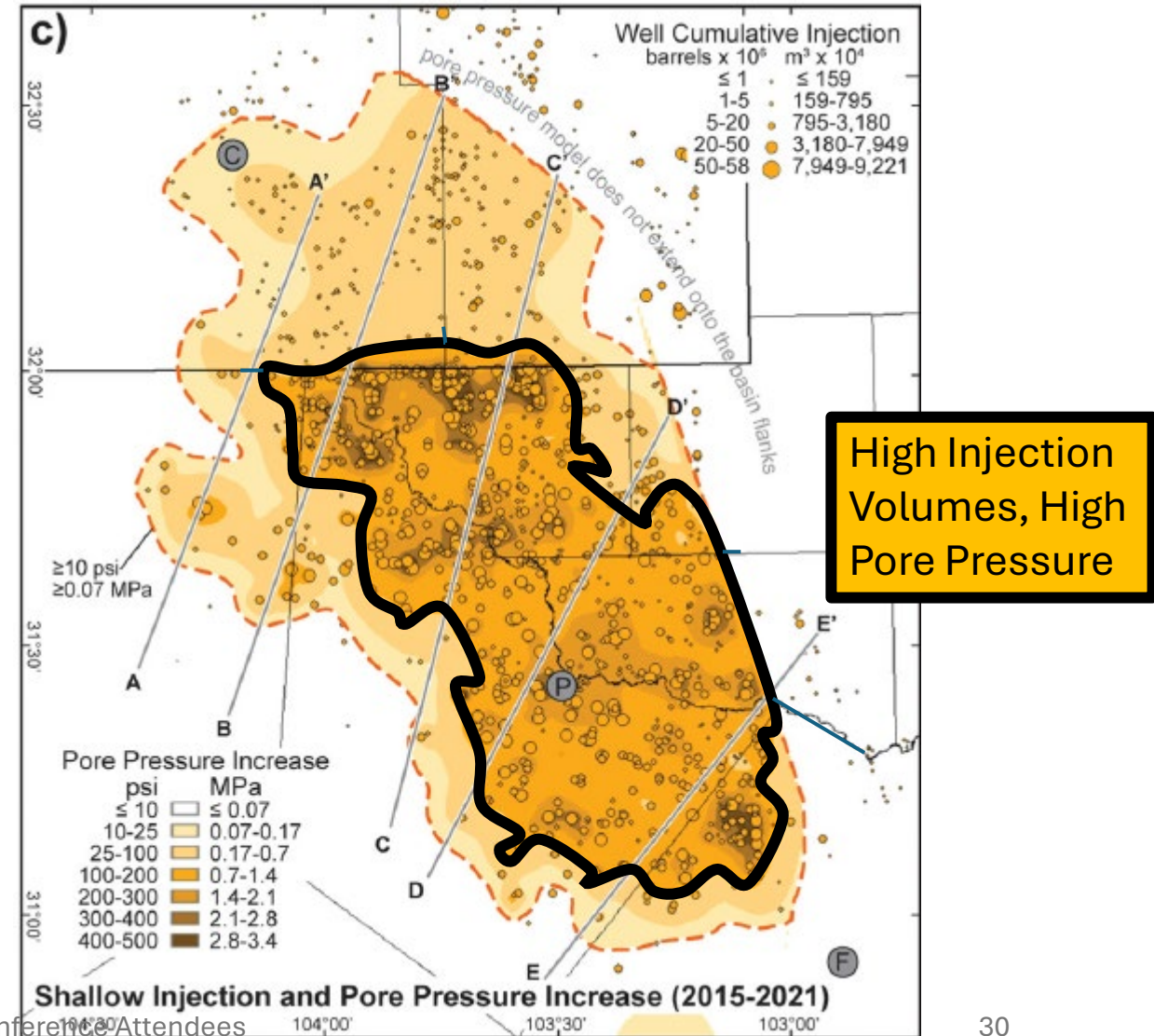
Annotations and commentary to follow by Energy Makers Advisory Group

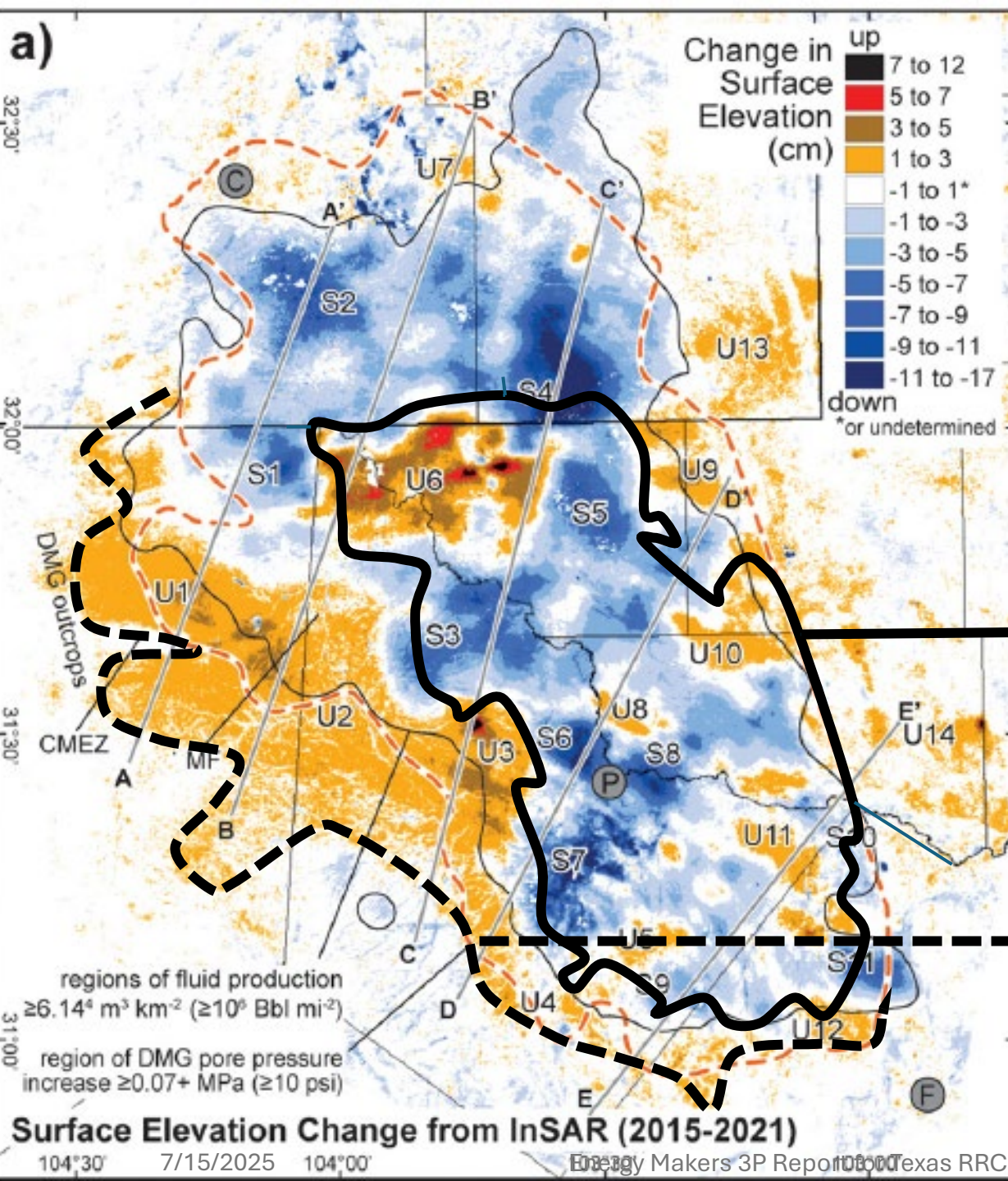
Local versus “Far Field” Effects

Produced Volumes > Surface
Elevation **Decrease**



Injected Volumes > Surface
Elevation **Increase**





Development of complex patterns of anthropogenic uplift and subsidence in the Delaware Basin of West Texas and southeast New Mexico, USA

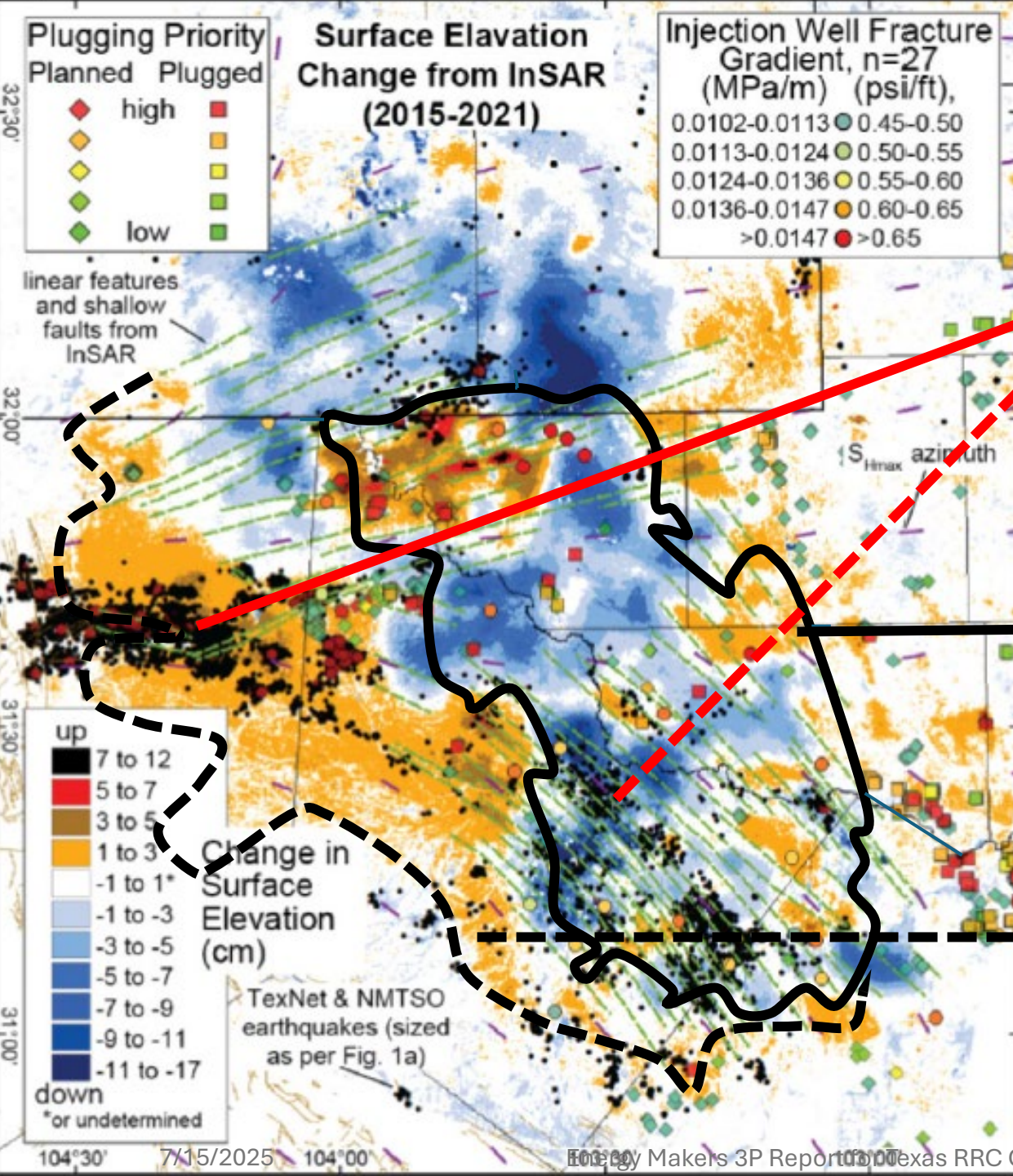
Peter Hennings^{a,*}, Scott Staniewicz^b, Katie Smye^a, Jingyi Chen^b, Elizabeth Horne^a, Jean-Philippe Nicot^a, Jun Ge^a, Robert Reedy^a, Bridget Scanlon^a

^a Bureau of Economic Geology, Jackson School of Geosciences, The University of Texas at Austin, P.O. Box X, Austin, TX 78713-8924, United States of America

^b Department of Aerospace Engineering and Engineering Mechanics, The University of Texas at Austin, Austin, TX 78713-8924, United States of America

High Injection Volumes, High Pore Pressure

InSAR Surface Elevation Change



Development of complex patterns of anthropogenic uplift and subsidence in the Delaware Basin of West Texas and southeast New Mexico, USA

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“Far Field” injection and production effects play a dominant role in Induced Seismicity – slow, long term, subsurface pressure communication pathways

Repeat: Contributors to Induced Seismicity are multifaceted and complex

Reservoir Conditions Ex:

- Presence and proximity to faults and fault networks
- Fault orientation relative to local stress fields
- Pore pressure and pathways
- Fault friction and structure, etc.
- Rock Strength / Brittleness
- Temperature
- Pathways to deep basement faults
- Fluid / pressure balance in reservoir

Formation Permeability Ex:

- Can be complex:
- Higher permeability formations provide more pathways for fluid/pressure transmission and dispersion,
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- Lower permeability faults can serve as a bottleneck allowing stress to accumulate

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- Injection rate
- Injection pressure
- Fluid temperature
- Injection depth
- etc.

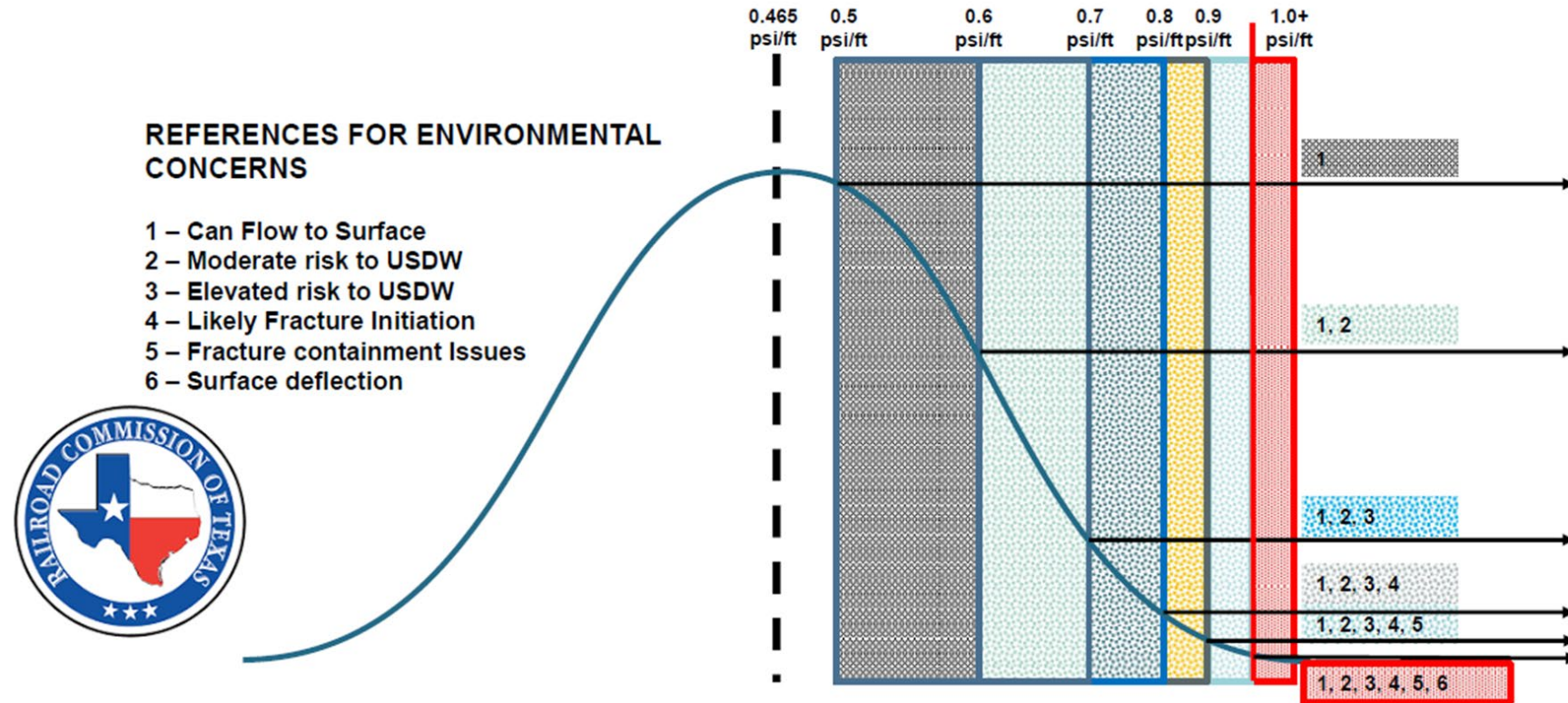
Chapter B

Fracture Gradient

Increased Reservoir Pressure



SIMPLE DISTRIBUTION OF ELEVATED PORE PRESSURE DUE TO PRODUCED WATER INJECTION



BottomHole Pressure Gradient PSI/FT

≤0.5

0.50-0.60

0.60-0.70

0.70-0.80

0.80-0.90

0.90 +

**Texas RRC
References for
Environmental
Concerns**

**Can Flow to
Surface**

**Moderate
risk to USDW**

**Elevated risk
to USDW**

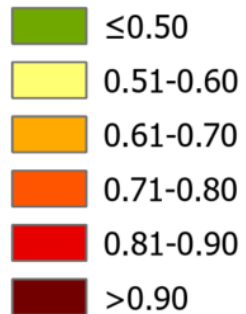
**Likely
Fracture
Initiation**

**Fracture
containment
issues**

3P Report: Bottom Hole Pressure Gradients, DMG

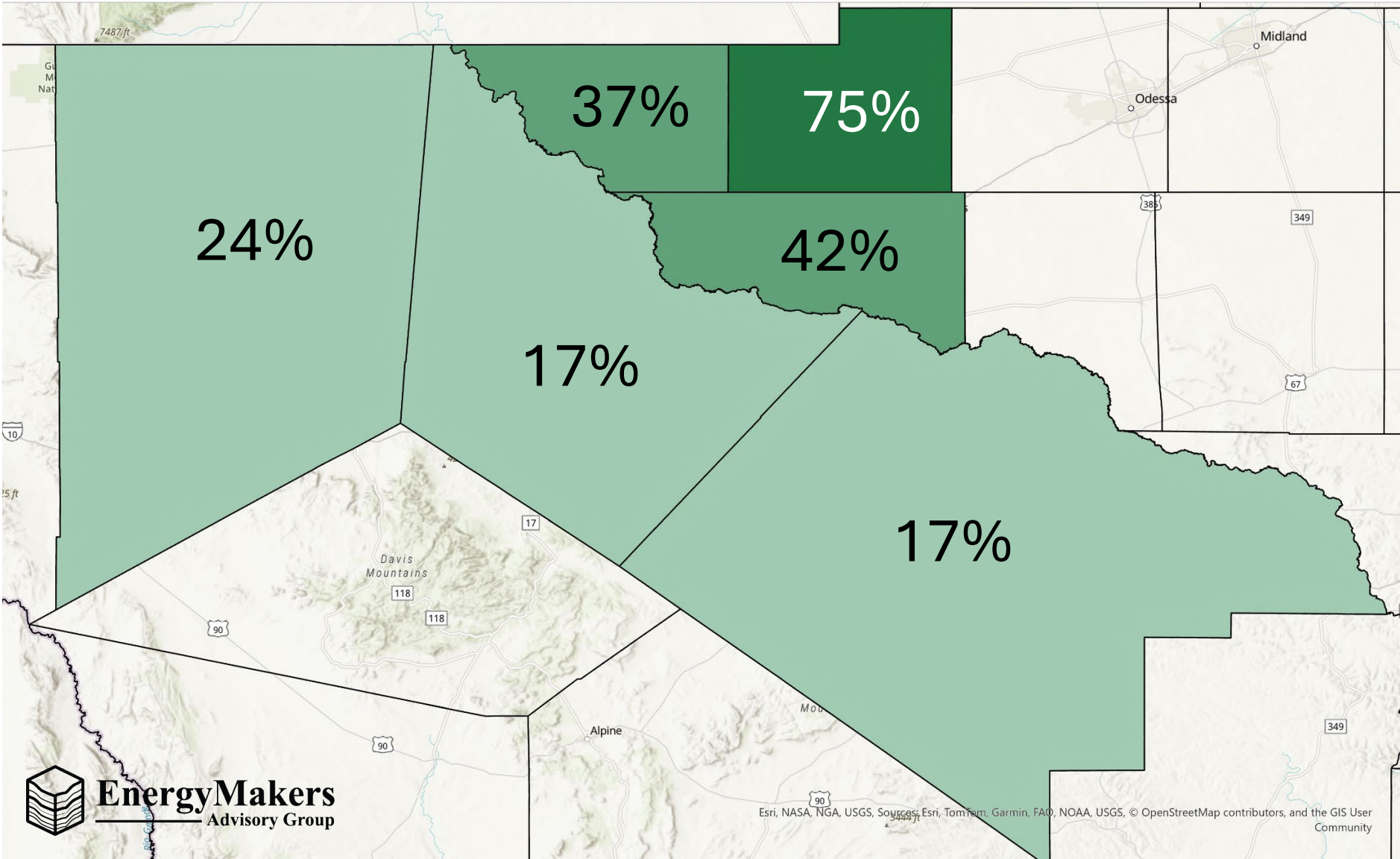
See Map Details at Conference!

2023 Operating Injection
Pressure Gradient
(psi/ft)



Likelihood of injecting below DMG Frac Pressure?: (Yes, I am)

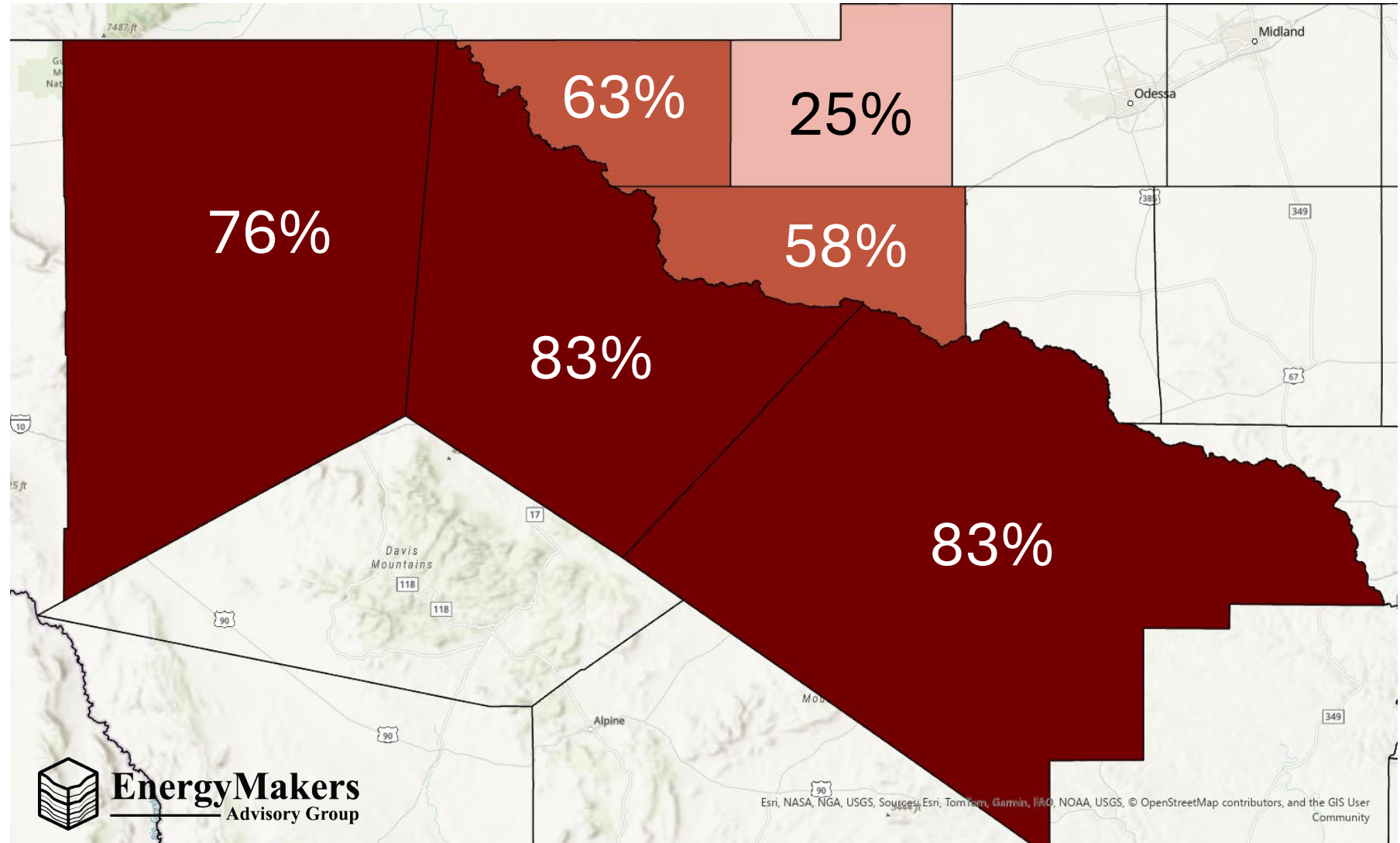
By County
Percent of Wells
w/ 2023 BHP =<
Local Estimated
DMG Frac
Gradient



Likelihood of injecting above DMG Frac Pressure?:

By County

Percent of Wells
w/ 2023 BHP \geq
Local Estimated
DMG Frac
Gradient



Under new guidance, the following % wells, injecting above estimated frac pressures for the Injection Interval, will require proof of upper and lower confinement with frac pressures above injection interval BHPs

Consequence?

SWD Permit Applicants will be required to profile Upper and Lower Confinement Intervals:

- Are 25' thick or greater (relatively easy!)
- Have fracture pressures greater than anticipated injection Zone operating pressures
- Provide reliable confinement: prohibit fluid flow, (contemplate fractures, karsts, permeability, etc.)
- In the DMG, candidates may include the Castille or San Andres (upper confinement), or Cutoff Shale/Avalon/ Bonespring (lower confinement)
- Exercise requires geologic scrutiny – not a “layup”.

Chapter B

Bottomhole Pressure Gradients (and impact on Maximum Daily Allowable Injection Volumes)

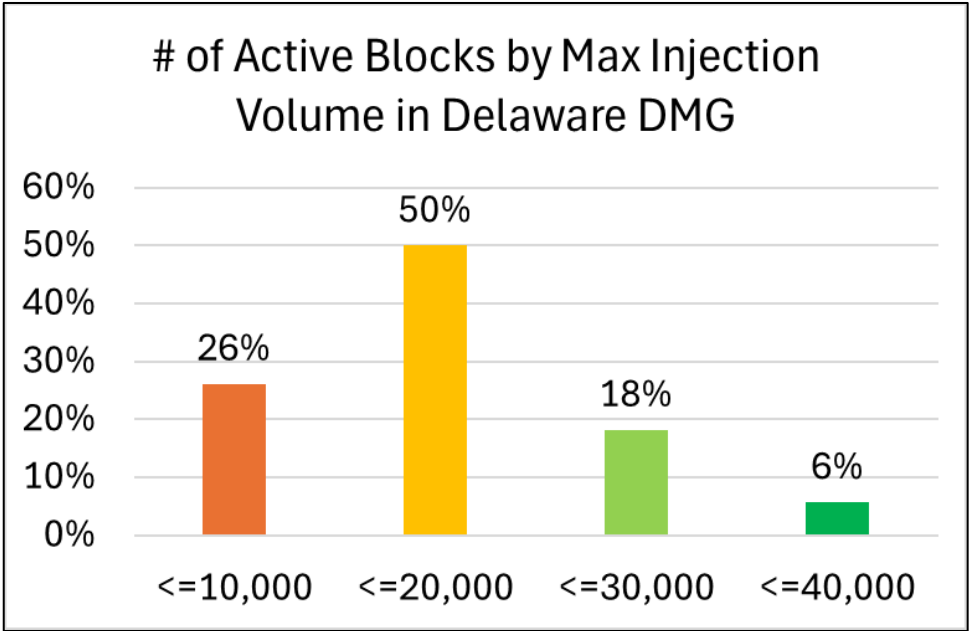
Translating TRRC Guidance to Maximum Daily Injection Volumes

BottomHole Pressure Gradient PSI/FT	≤0.5	0.50-0.60	0.60-0.70	0.70-0.80	0.80-0.90	0.90 +
Texas RRC References for Environmental Concerns		Can Flow to Surface	Moderate risk to USDW	Elevated risk to USDW	Likely Fracture Initiation	Fracture containment issues
	↓	↓	↓	↓	↓	↓
Maximum Daily Injection Volumes	40,000 BPD	30,000 BPD	20,000 BPD	10,000 BPD	10,000 BOD	10,000 BPD

MDIV is calculated for Average BHPS in the 2 Mile AOR.

In the Delaware Basin on average 76% of DMG blocks will be restricted to 10,000 – 20,000 BPD.

Detailed Maps Available at Conference Proceedings



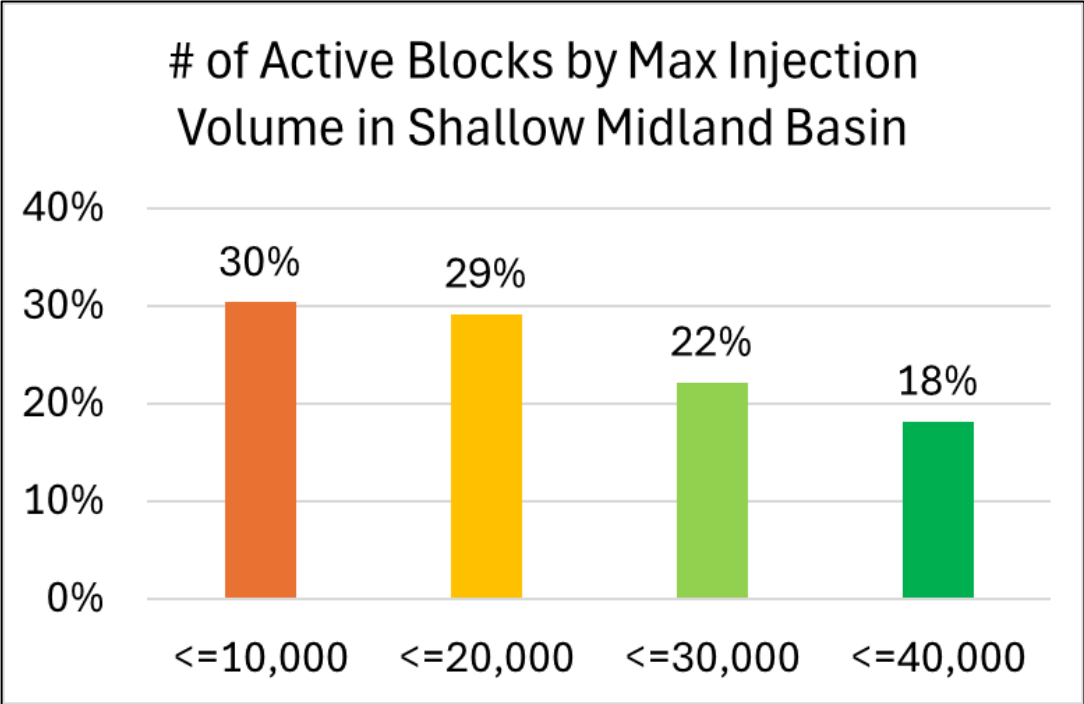
Maximum
Daily
Injection
Volumes



Energy Makers 3P Report for Texas RRC Conference Attendees

Similarly, 59 % of blocks in the Shallow Midland Basin would on average be restricted to 10,000-20,000 BPD, (41% at 30,000+ BPD)

Detailed Maps Available at Conference Proceedings



Finding Relief From High BHPs is possible

Percent of Blocks
with BHP IPG ≤ 0.6
psi/ft

Across the
Delaware, **18%** of
active DMG
Blocks have BHPs
 ≤ 0.6 psi/ft, and
might allow MDIV
as high as 30,000
BPD

Detailed Maps
Available at
Conference
Proceedings

Tip #1: In the Midland Basin, Lower relative Pressures are obtained with Depth in many areas



EOR INJECTORS	Active Count							Min Injection	Max Injection
		≤0.5	0.50-0.60	0.60-0.70	0.70-0.80	0.80-0.90	0.90 +	Depth	Depth
Grayburg	406	30	204	76	89	7	0	4,059	4,902
San Andres	703	29	154	164	186	87	83	3,900	6,960
Clear Fork	418	11	75	253	78	1	0	3,700	7,360
Wolfcamp	52	10	5	20	17	0	0	7,000	9,018

Data Source: EnergyMakers Advisory Group 2024 Permian BHP Survey

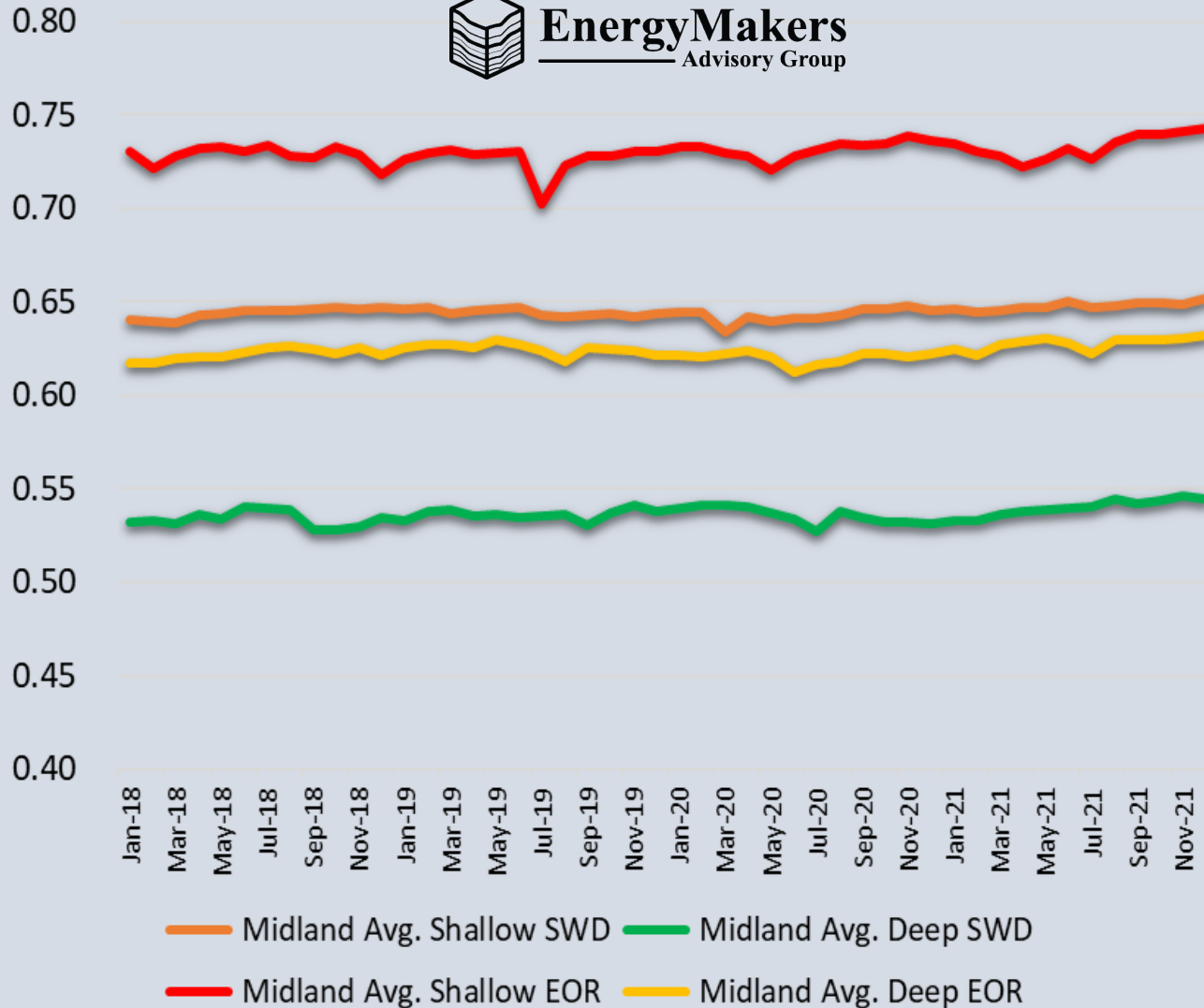
SWD INJECTORS	Active Count							Min Injection	Max Injection
		≤0.5	0.50-0.60	0.60-0.70	0.70-0.80	0.80-0.90	0.90 +	Depth	Depth
Grayburg	12	0	4	8	0	0	0	4,220	5,080
San Andres	71	7	23	21	12	8	4	3,877	6,452
Clear Fork	13	0	3	7	3	0	0	3,900	6,820
Devonian	27	9	11	5	2	0	0	5,000	12,800
Ellenburger	30	19	9	2	0	0	0	6,215	13,386

Data Source: EnergyMakers Advisory Group 2024 Permian BHP Survey

Midland Avg. BottomHole Injection Pressure Gradient (psi/ft) by Well Type



EnergyMakers
Advisory Group



Tip # 2: Stay away from shallow EOR plays...and possible pressure communication

SHALLOW EOR

SHALLOW SWD

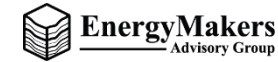
DEEP EOR

DEEP SWD

Shallow EOR formations are much higher pressured, on average, than SWD formations, **but appear to “influence” nearby SWD.**

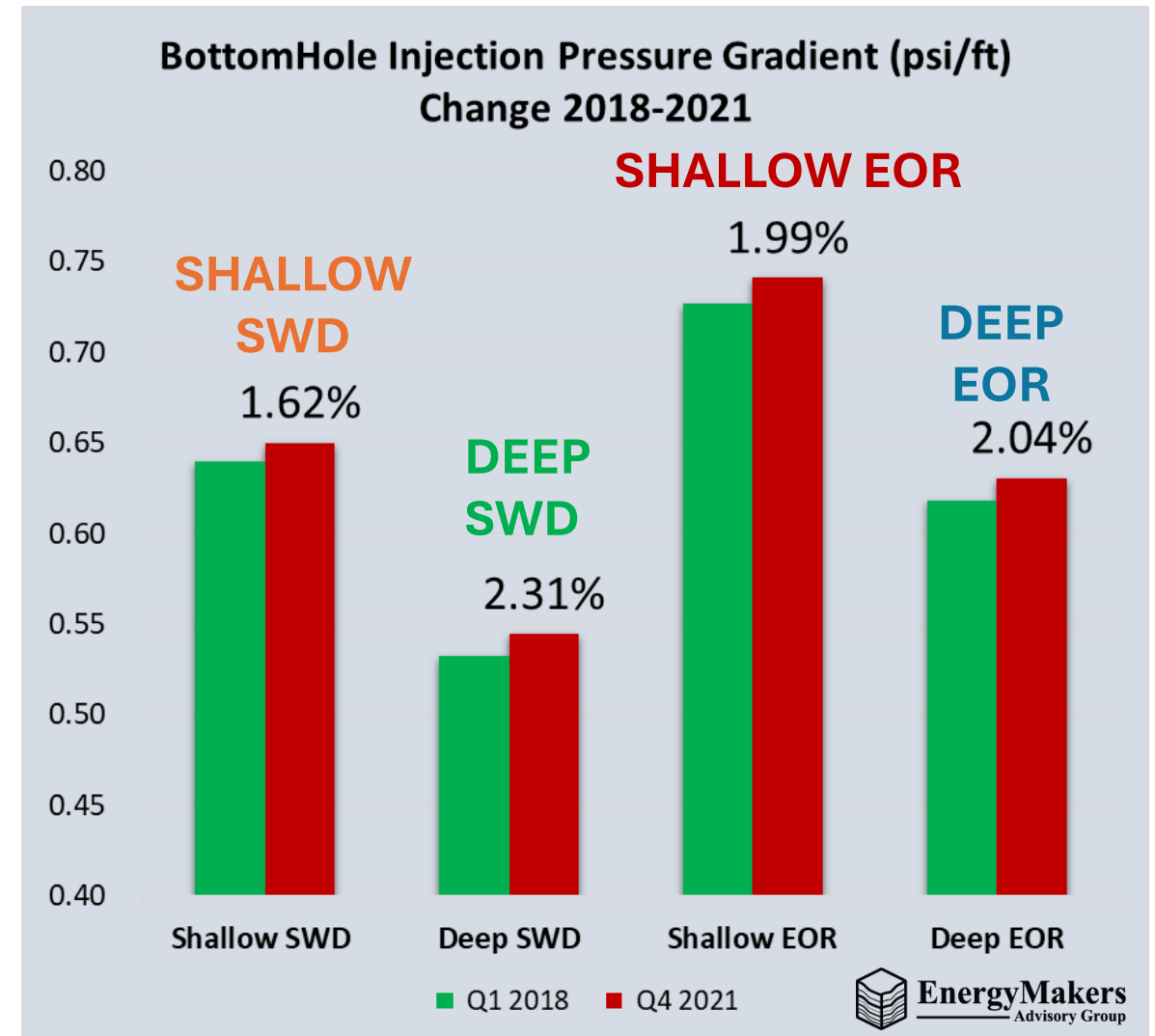
Both Shallow SWD and EOR are much higher pressure on average than Deep SWD Formations.

Midland Basin Average Bottomhole Pressure Gradients (PSI/ft) are gradually increasing across the basin – all Well Types



Tip # 3: Avoid areas showing recent signs of pressure increases; you are likely to have more “pressure runway”

69% of active DMG blocks are increasing in BHP (Average BHP change, active blocks)



Finding Relief from High Bottom-Hole Pressures

Delaware 3P Report

Midland 3P Report

Tip # 4: Stay away from areas of high-density injection/ square mile. You are more likely to obtain more “pressure runway”.

3P Report Chapters F, G, and H and I

1/2 Mile Radius of Review

2 Mile Radius of Review

Protection of Injection Intervals

Isolation from Base of Groundwater

Interval Integrity/Isolation & Relative Risk of AOR “Penetrations” (wells)

*Prove your proposed injection Interval in 2 –Mile AOR is Isolated...
(else lower allowable BHP)*

Score’s “highest risk” well in terms of:

- ☐ Age of well
- ☐ Active Responsible Operator
- ☐ Proximity to Injection
- ☐ Completion / isolation / integrity of interval
- ☐ Plugged or abandoned wells
-
- ☐ Also check Freshwater protected

The proposed Texas RRC Algorithm identifies “worst well” in the 2-Mile AOR

We applied algorithms to each Block, generally **2.5 X** larger than a 2 mi radius AOR.

Any (single) high risk from the list, associated with one (1) well in the AOR, could result in a deducted .05 psi/ft. imposed pressure “buffer” from MSIP.

Therefore, the number of AOR penetrations also correlate with risk metrics

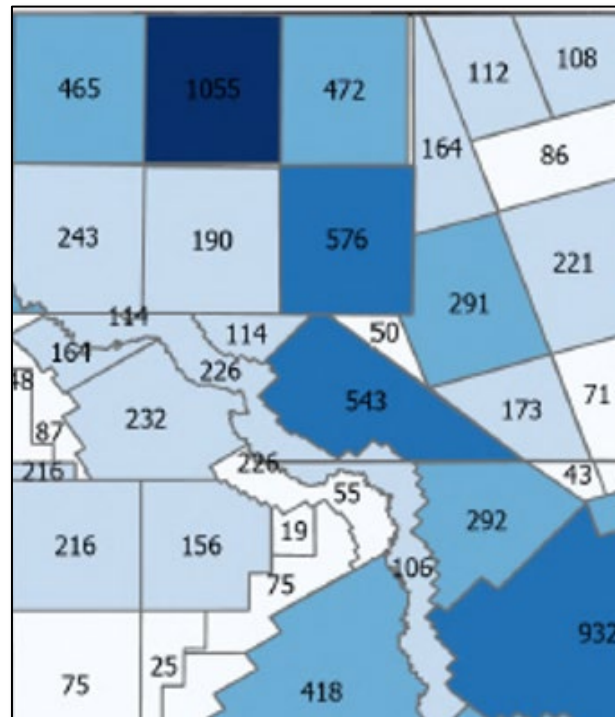
Likelihood of .05 psi/ft “buffer” – # of **Penetrations** is a Factor

Because the algorithm considers the “highest risk” well in the AOR, a higher number of penetrations is more likely to have at least one high risk well.

Even (1) risk factor is likely to result in a .05 psi/ft BHP pressure buffer requirement.

Delaware 3P Report

See Map Details at Conference



Data Completeness and Interval Protection

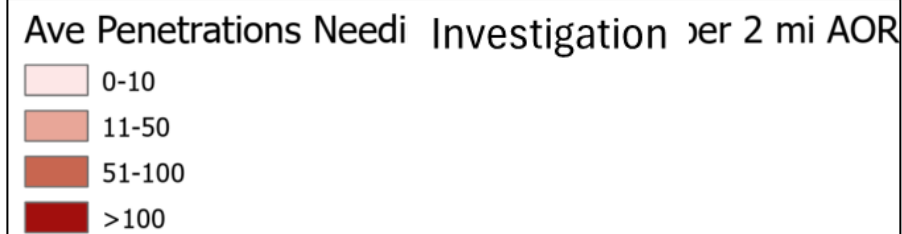
Algorithms require
Data Completeness
for every Penetration
in 2 and ½ Mile AOR:

- Cement Data
- Casing Data
- Perforations
- ID of Base of Freshwater

If one or more fields
are incomplete, this
will flag the algorithm.

*The 3P Report checks
for Data
Completeness, Every
Penetration.*

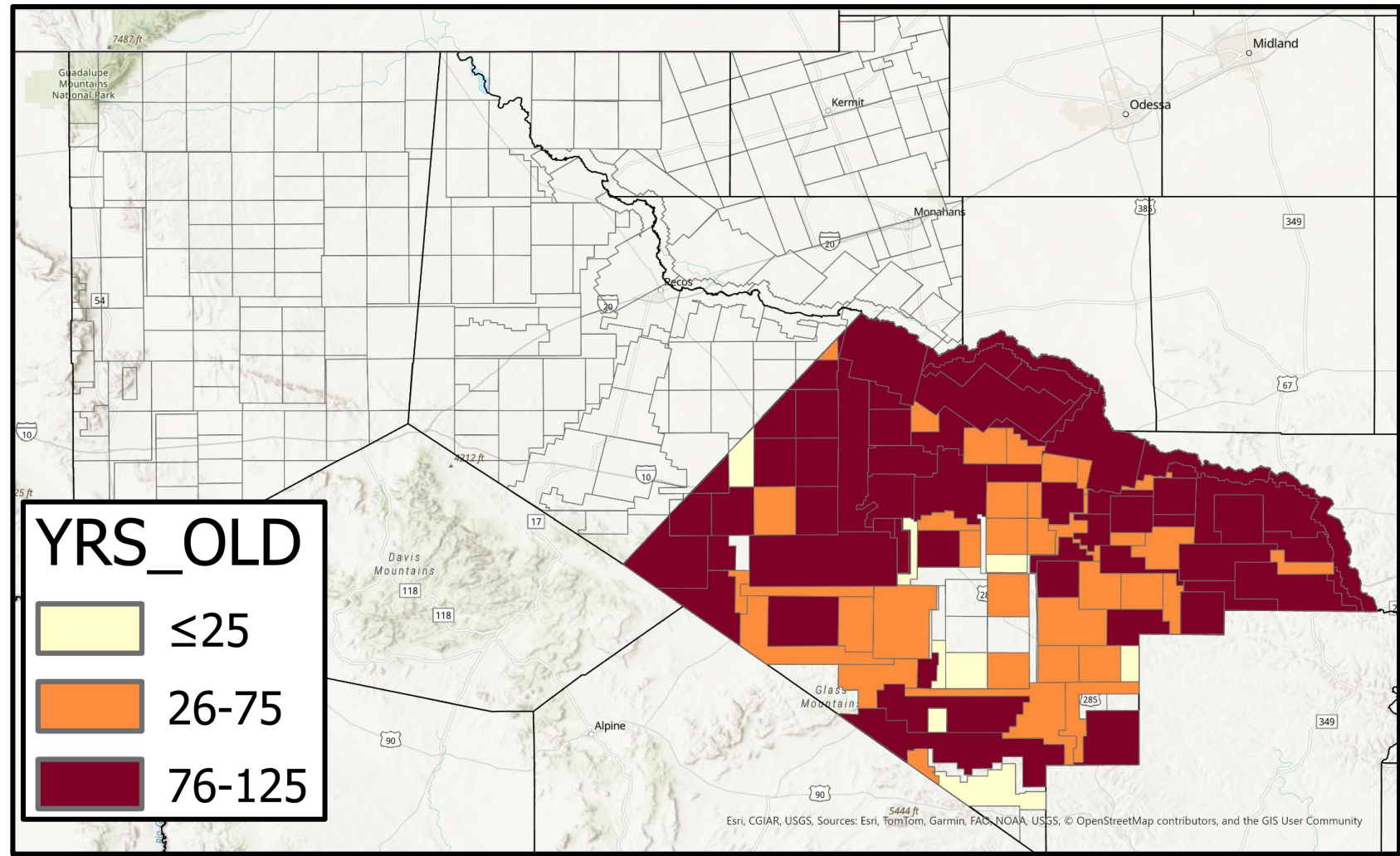
See Map Details at Conference



Likelihood of .05 psi/ft “buffer” – from Old(est) wells*

Age of Well also drives the algorithm.

Even (1) really old well, (or a well without completion date*) is likely to result in a .05 psi/ft BHP pressure buffer requirement.



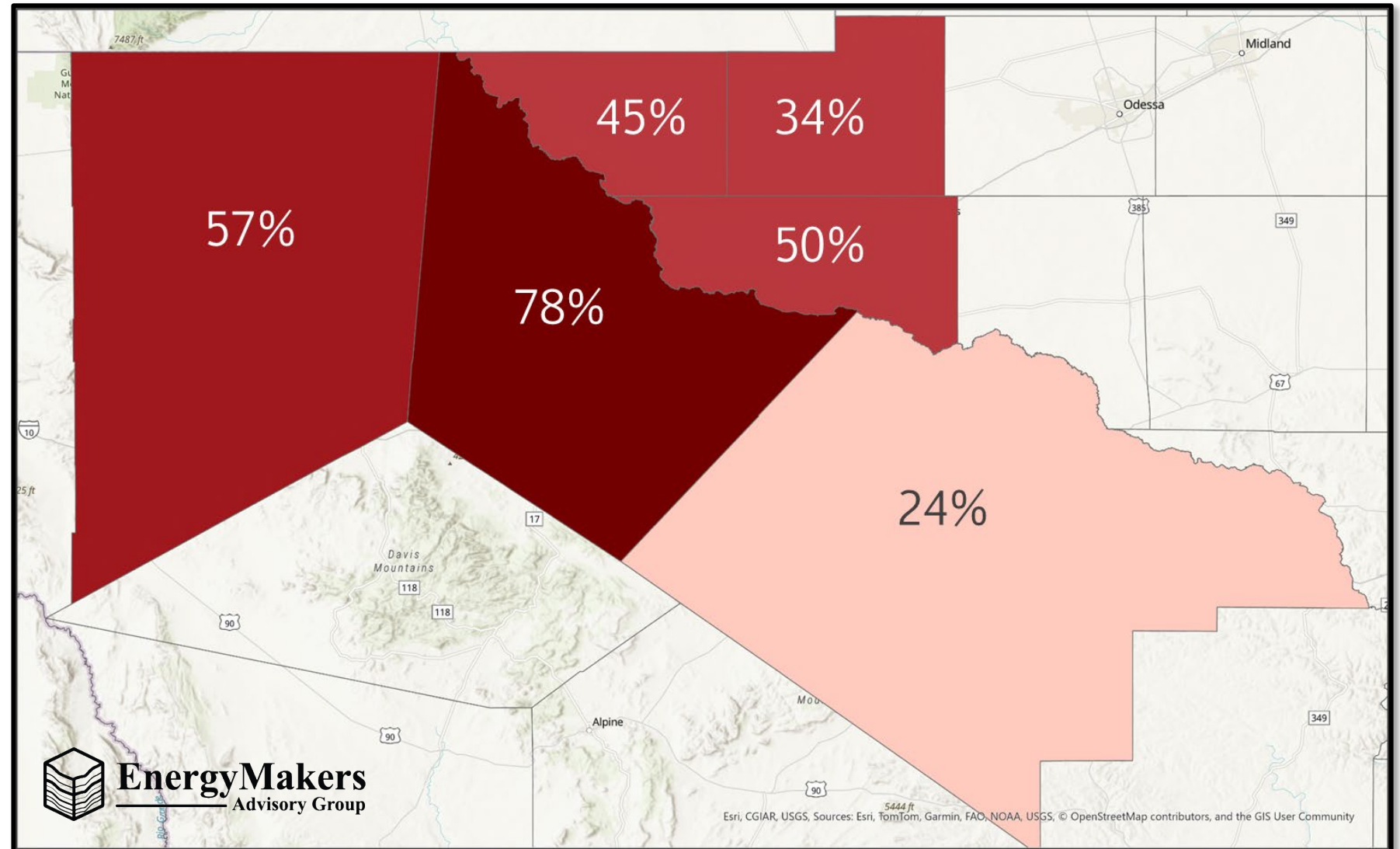
If completion date not available or data missing, algorithm assumes 125 years.

Likelihood of .05 psi/ft “buffer” – Active Operator Unknown

Percent of Blocks per county with one or more wells missing “active operator”.

Within the AOR, if a (single) well is identified without a known Active Operator, the algorithm will be impacted;

likely to result in the .05 psi/ft BHP pressure buffer requirement.



Likelihood of .05 psi/ft “buffer” – Orphan Wells

Texas RRC
Orphan Wells as
of January 2025.

Concentration is
in /near Central
Basin Platform
and NW Shelf

Orphans in East
Delaware, mainly

See Map Details at Conference

Orphan Wells and “Parallels” with old EOR Plays

See Map Details at Conference

EOR Well Density

Orphan Well Density

Chapter J

Environmental Risks and Considerations

3P Report: Best to Avoid (The Laundry List!)

☐ Faults

☐ Earthquakes

☐ Known Surface Anomalies

☐ Plugged and Abandoned Wells

☐ Inactive Unplugged Wells

☐ Wells with no Active Operators

☐ Orphan Wells

☐ Wells lacking Cement, Casing,
Perforations, or base of Freshwater

☐ Older Penetrations

☐ Areas with High BHP

Areas with Increasing BHP*

Areas with Low and Decreasing BHP*

Areas of High Density Injection*

Old EOR Wells*

Heavily faulted / karsted / heterogeneous /
unknown confinement Zones*

*(*not regulatory factors, Energy Maker's advises consideration)*

Screening for SWD **\$Performance** (3P Considerations)

AI Interpretation of O&G business...swimming in cash

- ☐ Margin between BHP and Confinement Frac Gradients
- ☐ Moderate Reservoir BHPs (not too high, or too low...)
- ☐ Interval Thickness
- ☐ Injection Density in AOR (Proves capacity...but if very high, can be a concern...)
- ☐ Average BPD for Area SWDs (Low, High, Average)
- ☐ Permitted Pressure & Volume Utilization for SWDs in area – is there runway?
- ☐ Texas RRC MDIV Calculations
- ☐ Texas RRC MSIP Calculations
- ☐ Area Surface Pressures relative to predicted MSIP
- ☐ Avoidance of Risk (previous slide)



Summary



Industry consultants estimate a full SWD Permit application will cost 10X what it did a decade ago, **due to rigorous permitting and extensive data gathering & mining requirements.**



Rapid Screening approaches can alleviate most of the timeline and resource cost: quickly rule out target locations:

- * unlikely to be permitted, or,
- * likely to have poor overall performance.



We recommend **THREE sets of Screening Thresholds:**

- 1) RRC Permitting Requirements
- 2) Company consideration of possible environment / litigation Risks
- 3) Company consideration of desired SWD Financial Performance



For penetrations within the ½ mile of Review needing remediation, your Company now has the option of **paying the RRC for remediating activities, without incurring liability** (a win-win).



For areas requiring Seismic Reviews, **establish a monitoring and safety program** to improve MDIV / potential financial performance for the SWD Asset.