

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

APPLICATION OF SELECT WATER
SOLUTIONS, LLC FOR APPROVAL
OF A SALTWATER DISPOSAL WELL,
LEA COUNTY, NEW MEXICO.

CASE NO. 25899

**NOTICE OF SUPPLEMENTAL EXHIBIT TO THE CITY OF JAL'S ENTRY OF
APPEARANCE, NOTICE OF INTERVENTION, AND REQUEST FOR HEARING &
OBJECTION TO PROCEEDINGS BY AFFIDAVIT**

COMES NOW, the City of Jal (City), by and through undersigned counsel, and for its
Notice of Supplemental Exhibit to its Entry of Appearance, Notice of Intervention, and Request
for Hearing & Objection to Proceedings by Affidavit states as follows:

1. On Friday May 1, 2026, the City filed its Entry of Appearance, Notice of Intervention,
and Request for Hearing & Objection to Proceedings by Affidavit which included the
signed affidavit of Meghan Hodgins as Exhibit A.
2. On Monday May 4, the OCD law clerk, Freya Tschantz, confirmed that the City's Entry
of Appearance, Notice of Intervention, and Request for Hearing & Objection to
Proceedings by Affidavit was filed in the above captioned case.
3. Attached hereto is Exhibit A, the notarized affidavit of Meghan Hodgins, that will
supplement the City's Entry of Appearance, Notice of Intervention, and Request for
Hearing & Objection to Proceedings by Affidavit.

Respectfully submitted,

DOMENICI LAW FIRM, PC

/s/ Pete Domenici

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record via electronic mail on May 4, 2026:

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/s/ Zachary Kim

Zachary Kim

Exhibit A

Affidavit of Meghan Hodgins

Meghan Hodgins, being over 18 years of age and of sound mind swear to the following:

1. I graduated from Hartwick College in New York State with a Bachelor of Arts in Geology in 1994;
2. In 1997, I obtained a Master of Science Degree in Earth and Planetary Science from the University of New Mexico;
3. I am employed as a Senior Consultant at GZA GeoEnvironmental, Inc. d/b/a Glorieta Geoscience in Santa Fe New Mexico. I have 27 years of professional experience encompassing the following areas: development of three-dimensional groundwater flow models in basin fill and fractured bedrock aquifers; well design, lithologic evaluation, and evaluation of geophysical logs; geologic mapping for mineral resource evaluation and well siting; field monitoring of drilling and installation of well nests to depths of up to 2,500 feet; field management, data collection and analysis of aquifer tests and sampling of discrete groundwater zones in multi-aquifer systems; support for water rights applications and protests including analyzing water rights applications for new appropriations and transfers; and preparation of expert reports and preparation for testimony in OSE administrative proceedings;
4. Glorieta Geoscience, Inc., then Glorieta Geoscience, A Division of GZA GeoEnvironmental, Inc., and now GZA GeoEnvironmental Inc. d/b/a Glorieta Geoscience of Santa Fe New Mexico has been the hydrology and water rights consultant for the City of Jal, New Mexico since 2018. The work conducted for the City of Jal includes the following topics: Research and compilation of aquifer test data and aquifer extent for construction and testing of groundwater models; Groundwater modeling of the Pecos Valley Alluvium Aquifer and Dockum Group (Santa Rosa Sandstone) Aquifer in

- the vicinity of the City of Jal; Groundwater modeling in support of City of Jal groundwater rights applications for municipal supply wells; Jal Basin and Monument Draw Trough geohydrologic analysis, mapping, and cross section construction; Well analysis for determination of the Pecos Valley Alluvium Formation thickness, saturated thickness and volume of saturated formation; Providing expert testimony in Office of the State Engineer (OSE) hearings in support of Jal's protest of applications for new appropriations of groundwater in the Jal, Capitan, and Carlsbad Administrative Basins;
5. I have been accepted as an expert witness in hydrology and groundwater modeling in an OSE administrative hearing and testified on behalf of the City of Jal;
 6. Based on our previous work for the City of Jal mapping the thickness of the Pecos Valley Alluvium Formation (PVA) in the Monumental Draw Trough in New Mexico, including interpretation of fault locations from geophysical log analyses in the area of the Monument Draw Trough and determination of the area of saturation and saturated thickness of the PVA aquifer, the following concerns for the protection of the City of Jal's sole source drinking water supply have been defined:
 - a. The proposed SWD Coyote Fed 14 Well #1 is within 1 mile of two City of Jal permitted municipal water supply well locations (Exhibit 1).
 - b. The proposed SWD Coyote Fed 14 Well #1 is within 2 miles of ten existing City of Jal wells, six of which are active water supply wells for the municipal water system, and one permitted municipal water supply well location (Exhibit 1).
 - c. The proposed SWD Coyote Fed 14 Well #1 is located less than 1 mile from the western bounding fault of the Monument Draw Trough. There are likely additional faults in this area related to the formation of the Monument Draw

Trough, the structural basin that contains the PVA aquifer in New Mexico (Exhibit 1).

- d. Faults near a SWD well are potential conduits for upward movement of injected produced water from the injection zone into the overlying formations. Fractures associated with the known faults may extend beyond the location of the mapped fault and may occur closer to the SWD site.
- e. The formation of the Trough was due to dissolution and collapse of evaporite formations, mainly the Salado Formation. The underlying Capitan Limestone is well-known for karst development in the Carlsbad area. The Capitan Limestone interfingers with Bell Canyon and Cherry Canyon Formations, the injection target zone, leaving the possibility of interconnection of these formations and hydrologic connection through karst features and fractures.
- f. The injection zone for the Coyote Fed 14 Well #1 is at a proposed minimum depth of 5175 feet, approximately 4700 feet below the bottom of the freshwater aquifers and in close proximity to a known fault. The high-pressure injection of produced water, even with 4700 feet of vertical separation, could potentially cause migration of produced water upward from the injection zone along fault and fracture paths into the fresh water aquifers.
- g. The proposed SWD Coyote Fed 14 Well #1 site sits on top of the saturated PVA aquifer and may also overlie the saturated Santa Rosa aquifer. These are the only two fresh water aquifers in the region (Exhibits 1 + 2).
- h. Drilling through the fresh water aquifers to reach the injection zone creates the potential for contamination during drilling. Injection of produced water under

high pressure at depth creates the potential for contamination through upward migration of fluid along fracture zones. The SWD operation at the ground surface is a potential source of aquifer contamination due to spills and leaks from broken produced water piping, holding tanks, or tanker truck transportation to the SWD site.

7. I concluded from my analysis that:

- a. The proximity of the proposed SWD Coyote Fed 14 Well #1 to the City of Jal well field poses a significant potential for contamination of the sole-source drinking water aquifer for the City.
- b. The location of the proposed SWD Coyote Fed 14 Well #1 on top of the saturated PVA aquifer creates a significant concern for contamination of the drinking water aquifer during drilling and injection activities and potential contamination from surface spills at or near the site from transport of produced water to the site.
- c. The location of the proposed SWD Coyote Fed 14 Well #1 near the Monument Draw Trough faults creates a significant potential for upward movement of produced water from the injection zone to the overlying freshwater aquifers.
- d. The relatively shallow proposed injection depth of the SWD Coyote Fed 14 Well #1 of 5175 feet increases the possibility of upward migration of produced water contaminants from the zone of injection into the overlying PVA aquifer. The likelihood of migration of injected fluids and contamination of the fresh water PVA and Santa Rosa aquifers is increased due to the proximity of the site to the interpreted fault locations bounding the Monument Draw Trough.

Meghan Hodgins
Meghan Hodgins

5/4/2026
Date

STATE OF NEW MEXICO)
)ss.
COUNTY OF SANTA FE)

The foregoing instrument was acknowledged before me this 1st day of May 2026, by Meghan Hodgins.

Patricia B. Lovato
Notary Public

My Commission Expires:

5-15-2028

