

March 12, 2013

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Oil Conservation Division
Attn: Florene Davidson
1220 S. St. Francis Drive
Sante Fe, New Mexico 87505

Re: Los Lobos Injection Permit Application - Case No. 14948

Dear Commission,

In opening, please regard this letter as notice of my cooperative interest in the future development of electricity utilizing the renewable energy resource confined within the Lightning Dock Known Geothermal Resource Area (KGRA). However, as a surface owner and proprietor of water and mineral assets within Lightning Dock, I want to address concerns I have regarding the permitting of cold water discharge (two injection wells) sited in Section 7.

My concerns, which should be mutually inherent by the Oil Conservation Division, are future water quality, impact to the Animas Valley water basin (water table), and reduction in geothermal temperature.

The impact to the water quality and water table are significant in the areas of pollution and waste, as documented scientific studies completed throughout the KGRA substantiate that geothermal fluids gravitate upward through fissures within the earth's crust to shallower depths, to which the same will occur with re-injected fluids, only in greater quantity, and with possible contaminants thus effecting the underground source of drinking water.

As a mineral righted land owner within the KGRA, I have a saleable interest in the cold water injection and its influence on the geothermal temperatures, as any cooling effects would have a significant impact in my ability to develop this same resource, either for direct or commercial use.

My concerns do not convey a negative opinion for future economic growth in the area, or the future of alternative energy, however it is my belief that additional viewpoints need to be considered regarding the possible spoils (pollutants, waste, cooling effects) of this alternative energy resource thus significantly impacting current and future uses throughout the KGRA.

I control 1,129 acres of deeded property; with 240 acres patented mineral rights therein, 342 acre feet ground water rights, and 2050.2 acre feet flood water rights. I also possess an operating agreement which conveys developmental rights of the geothermal resource up to 1,000 ft. in depth within the remaining 889 acres of deeded property.

All of which is directly located within the KGRA (Sections 1, 6, 7 and 12) and could incur irreversible damage if the discharge wells are approved prior to receiving the appropriate testing and monitoring stages for any long term approval.

And as a note for the Commission, as stated in the Annual Geothermal Well Report (Discharge Permit GTHT-001) published by Los Lobos Renewable Power, dated January 31, 2013 and certified under penalty of law by CEO Nicholas Goodman, "Lightning Dock Geothermal project protects correlative rights and allows each leaseholder and owner their just and equitable share of recoverable geothermal resources."

I have to assert that there has been no communication with Los Lobos regarding this matter, and ask that the Commission inquire as to how this is being handled!

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas McCants".

Thomas McCants
4359 Oakgrove
San Angelo, Texas 76904
Ph: 325-949-2083

Cc: Mr. Timothy McCants
Mr. William McCants