

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

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CASE NO. 15487

**APPLICATION OF THE NEW MEXICO OIL CONSERVATION DIVISION
THROUGH THE SUPERVISOR OF DISTRICT II FOR AN EMERGENCY ORDER
SUSPENDING CERTAIN APPROVED APPLICATIONS FOR PERMITS TO DRILL,
AND FOR ADOPTION OF SPECIAL RULES FOR DRILLING IN CERTAIN AREAS
FOR THE PROTECTIONS OF FRESH WATER, CHAVES AND EDDY COUNTIES,
NEW MEXICO**

SECOND AMENDED APPLICATION

The acting Supervisor of Oil Conservation Division (OCD) District II ("Applicant") hereby applies to the Director for adoption, after notice and hearing, of such special orders as may be required in the DESIGNATED AREA hereafter described, for the protection of sources of fresh water designated by the State Engineer. In support of this Application, Applicant would show the following:

[1] The DESIGNATED AREA in which a restrictive order is urgently needed consists of the lands in Chaves and Eddy Counties, New Mexico described in Exhibit A, attached hereto.

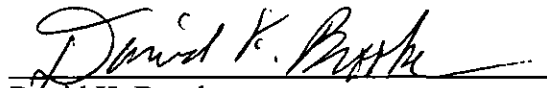
[2] The SUBJECT POOLS, identified in Exhibit B, attached hereto, are those pools all or parts of which are located in the DESIGNATED AREA.

[3] The State Engineer has designated the threatened aquifer(s) as a source of fresh water to be protected.

[3] Applicant further requests that, after notice and hearing, the Director issue such special orders as may be necessary for the protection of sources of fresh water designated by the State Engineer, in the DESIGNATED AREA of Chaves and Eddy Counties, New Mexico.

[4] An emergency exists because applications for permits to drill have been issued and are now in force the conditions of which may not adequately protect certain fresh water aquifers.

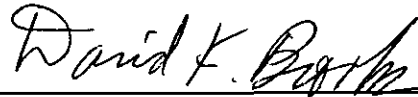
[5] Accordingly, Applicant FURTHER requests the Director to issue an INTERIM ORDER, after notice and hearing, effective until a full hearing is had on the merits of this Application and an Order issued thereon, suspending all existing APDs for wells not yet drilled within the Designated Area, and authorizing the acting District Supervisor to approve exceptions to such suspension for particular wells upon demonstration that fresh water sources will be adequately protected.



David K. Brooks
Assistant General Counsel
Energy, Minerals and Natural Resources Department
1220 S. St. Francis Drive
Santa Fe, NM 87505
Attorney for Oil Conservation Division
District II acting Supervisor

Certificate of Service

I hereby certify that the above pleading was served on the following parties by electronic mail on May 4, 2016.

A handwritten signature in cursive script, reading "David K. Brooks", written over a horizontal line.

David K. Brooks