

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

**APPLICATIONS OF RILEY PERMIAN
OPERATING COMPANY LLC,
FOR SALT WATER DISPOSAL WELLS,
EDDY COUNTY, NEW MEXICO**

CASE NOS. 24279-24280

V-F PETROLEUM, INC.'S HEARING EXHIBITS

Exhibit A	Self-Affirmed Statement of Dale Lubinski
A-1	Location Map
A-2	Cisco Structure Map
A-3	Cisco Isopach Plat
A-4	Mud Log - State "19" Com #001 Well
A-5	Dual Laterolog - State "19" Com #001 Well
A-6	Neutron Density Log - State "19" Com #001 Well
A-7	Comparison of Mud Log, Dual Laterolog, and Neutron Density Log
A-8	McMillan (Cisco Dolomite) Structure Map

CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2024, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

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/s/ Dana S. Hardy
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**SELF-AFFIRMED STATEMENT
DALE LUBINSKI**

1. I am a geologist for V-F Petroleum, Inc. (“V-F”). I am over 18 years of age, have personal knowledge of the matters addressed herein, and am competent to provide this Self-Affirmed Statement. I have previously testified before the New Mexico Oil Conservation Division (“Division”), and my credentials as an expert in petroleum geology matters were accepted and made a matter of record.

2. I am familiar with the geological matters that pertain to the above-referenced case.

3. Riley Permian Operating Company LLC (“Riley Permian”) has proposed two salt water disposal (“SWD”) wells in T-19-S, R-27-E of Eddy County, New Mexico. The Angel Ranch SWD #1 proposes to inject water into the Cisco Dolomite interval at a depth of 8,586’ – 9,210’, and the Angel Ranch SWD #2 proposes to inject into the Cisco Dolomite interval at a depth of 8,450’ – 8,975’. The Angel Ranch SWD #1 and the Angel Ranch SWD #2 are collectively referred to herein as the “Angel Ranch SWDs”.

4. V-F Petroleum Inc. (“V-F”) opposes the drilling of proposed Angel Ranch SWDs.

5. V-F is the current Operator of the State “19” COM #001 (API: 30-015-22380) well (“State “19” #1”) located 1,980 FNL, 2,043 FWL of Section 19, Township 19 South, Range 28 East, N.M.P.M, Eddy County, New Mexico, which was originally drilled and completed by

Case Nos. 24279-24280
V-F Petroleum Exhibit A

Southland Royalty Co., and is currently producing from the Morrow formation. The State "19" #1 well is located approximately 9,038' south and east from footage calls listed in Riley Permian's Re-Filed Application For Salt Water Disposal, Case No. 24279, for the Angel Ranch SWD #1 and is located approximately 11,582' south and east from the location depicted on the plat which accompanied Riley Permian's Re-Filed Application For Salt Water Disposal, Case No. 24279, for the Angel Ranch SWD #1. The State "19" #1 well is located approximately 15,306' south and east from both the footage calls and location depicted on the plat which accompanied Riley Permian's Re-Filed Application For Salt Water Disposal, Case No. 24280, for the Angel Ranch SWD #2. A map that depicts the location of the Angel Ranch SWDs in relation to the State "19" #1 is attached as **Exhibit A-1**.

6. As shown on the Cisco structure map attached as **Exhibit A-2**, the State "19" #1 well lies structurally downdip on the T/Cisco Dolomite some 335' to the proposed Angel Ranch SWD #1 well and estimated 450' downdip to the proposed Angel Ranch SWD #2 well.

7. As shown on the Cisco Isopach Plat attached as **Exhibit A-3**, the State "19" #1 well is also located in a section of the Cisco Dolomite where it is only approximately 595' thick and over a course of approximately less than a mile from the location of the State "19" #1, the Cisco Dolomite thins considerably to approximate 264' thick, where the Cisco formation essentially starts to pinch out as it meets up with the Basin.

8. A copy of the original Mud Log for the State "19" #1 well is attached as **Exhibit A-4**. As shown on the log, the well lost circulation in the T/Cisco Dolomite, lost some 1,500 BF, added lost circulation material, regained circulation, and drilled 10' of dolomite with excellent shows, a large gas increase, and had oil on the pits. This demonstrates an oil column of at least 15' of up hole, behind pipe potential in the State "19" #1, which is further confirmed and supported

by the Dual Laterolog attached as **Exhibit A-5** and the Neutron-Density Log attached as **Exhibit A-6**. Lining up the Mud Log, Dual Laterolog and Neutron-Density Log as shown on **Exhibit A-7**, it becomes evident that there is an extremely high potential for the production in economic quantities of oil and/or gas in the up-hole recompletion in the State "19" #1 well.

9. To verify how significant production can be in the Cisco Dolomite, a structure map of McMillian (Cisco Dolomite) Field in Sections 5, 7, and 8 of Township 19 South, Range 27 East, is attached as **Exhibit A-8**. From the five producing wells, the field produced 17.4 Billion Cubic Feet of Natural Gas and 420,000 Barrels of Oil. The structurally low well located in Section 7, Unit J produced 1.8 Billion Cubic Feet of Natural Gas and 49,000 Barrels of Oil.

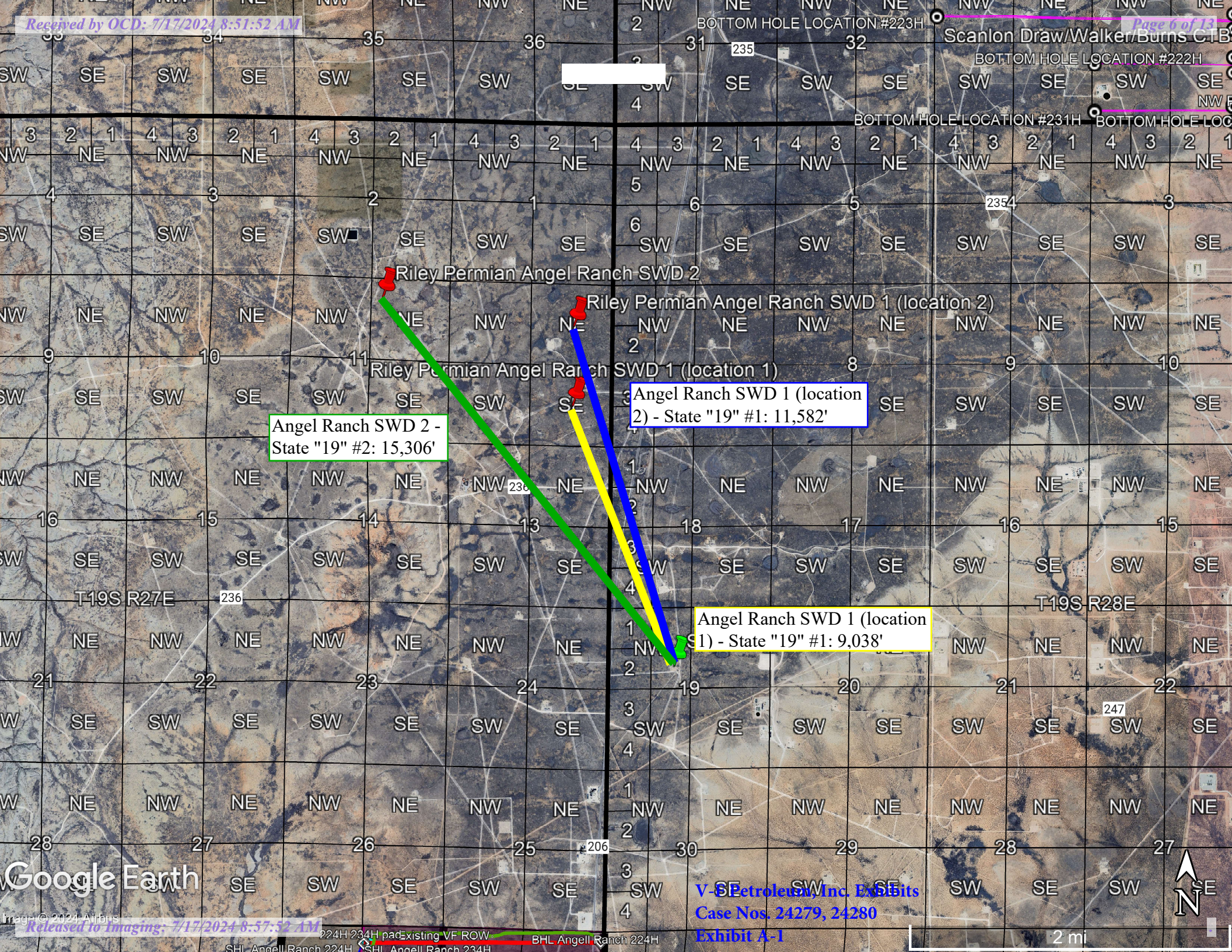
10. With the proposed Angel Ranch SWD wells being structurally up dip to the State "19" #1 well in the very porous Cisco Dolomite interval, it is extremely likely that the Riley Permian proposed Angel Ranch SWDs, if allowed to inject into the Cisco formation, will water out the reservoir in and under V-F's State "19" #1 well, resulting in waste and a lack of protection of correlative rights in the Cisco formation.

11. The attached exhibits were prepared by me or compiled from company business records.

12. I understand this Self-Affirmed Statement will be used as written testimony in this case. I affirm my testimony above is true and correct and is made under penalty of perjury under the laws of the State of New Mexico. My testimony is made as of the date identified next to my signature below.


Dale Lubinski

7-19-24
Date



Angel Ranch SWD 2 - State "19" #2: 15,306'

Angel Ranch SWD 1 (location 2) - State "19" #1: 11,582'

Angel Ranch SWD 1 (location 1) - State "19" #1: 9,038'

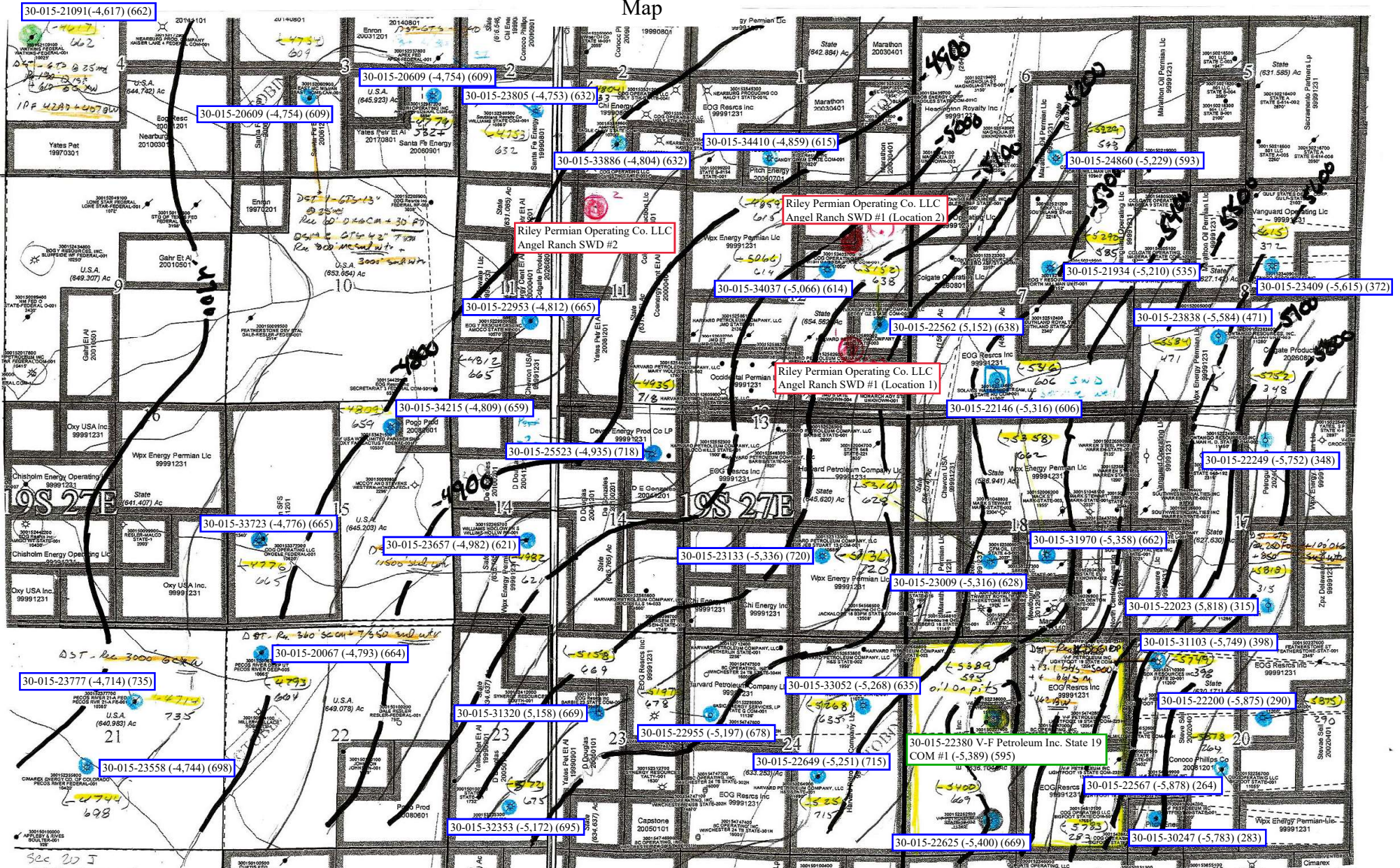
Riley Permian Angel Ranch SWD 2

Riley Permian Angel Ranch SWD 1 (location 2)

Riley Permian Angel Ranch SWD 1 (location 1)

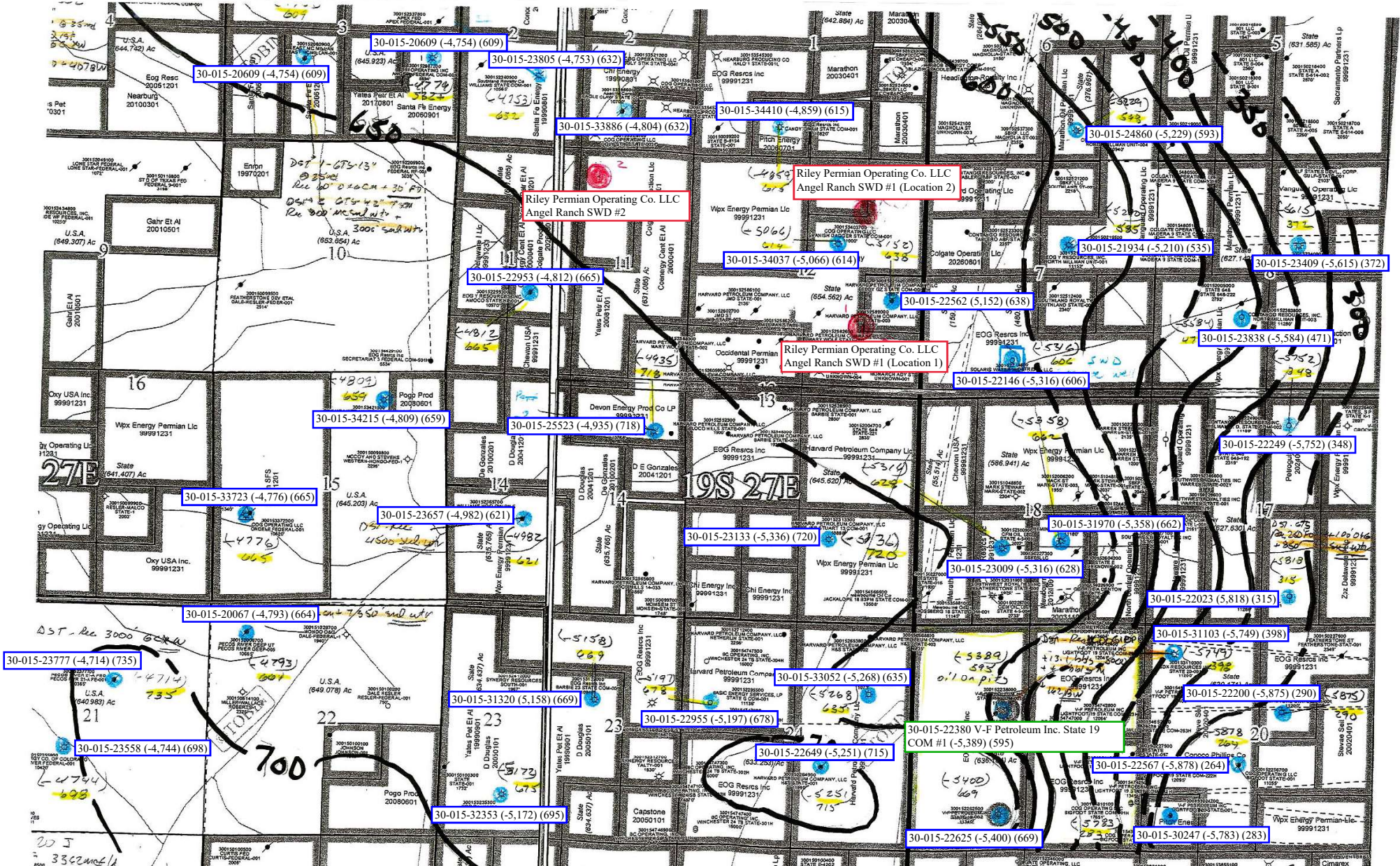
V-S Petroleum, Inc. Exhibits
Case Nos. 24279, 24280
Exhibit A-1

Cisco Structure Map

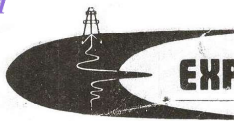


V-F Petroleum, Inc. Exhibits
 Case Nos. 24279, 24280
 Exhibit A-2

Cisco Isopach Plat



V-F Petroleum, Inc. Exhibits
 Case Nos. 24279, 24280
 Exhibit A-3

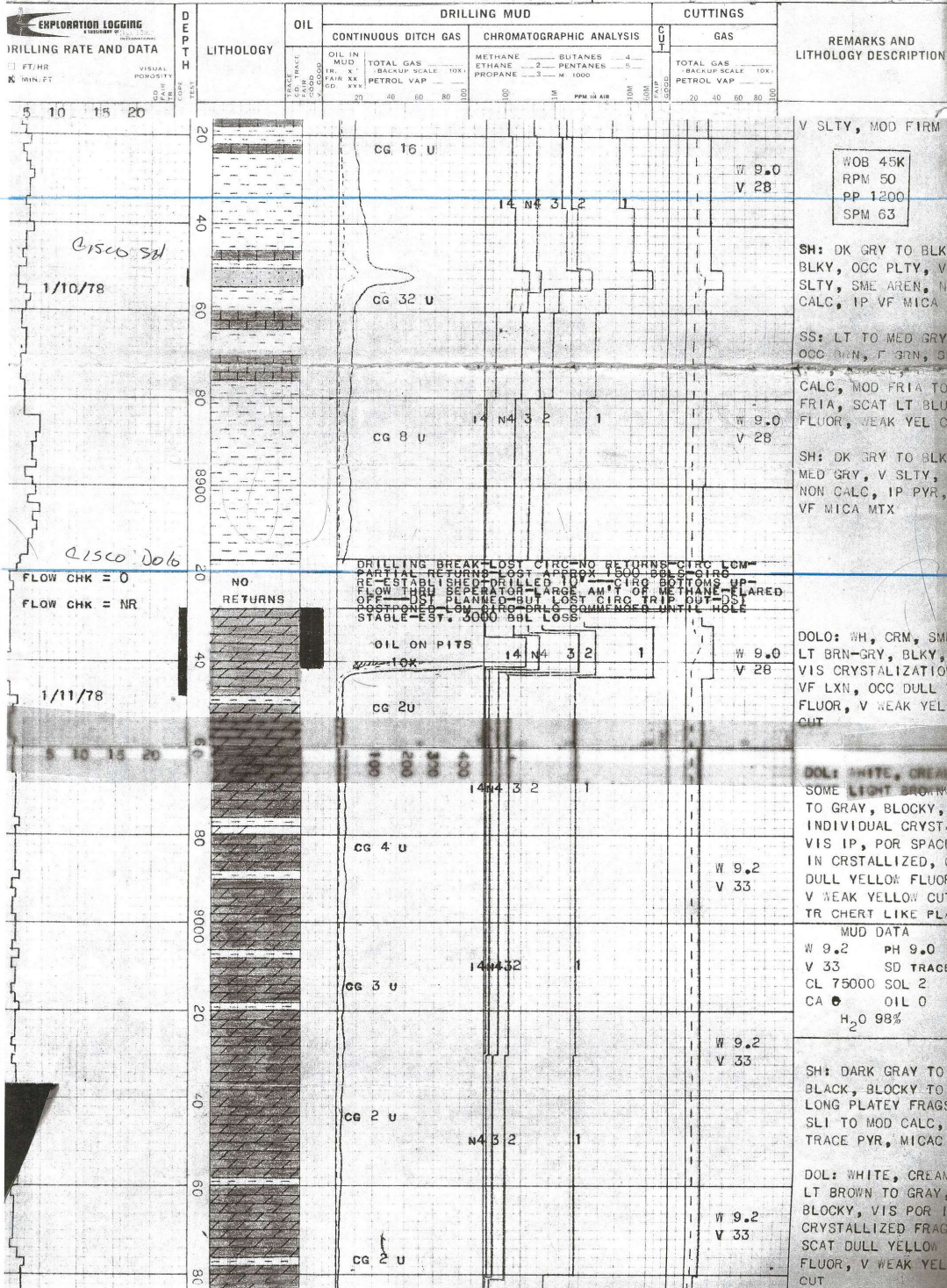


EXPLORATION LOGGING

A GEOLOGICAL - ENGINEERING SERVICE

SOUTHLAND ROYALTY CO.
EXPLORATION DEPT.
WELL #19

REMARKS		ABBREVIATIONS		COMPANY SOUTHLAND ROYALTY COMPANY			
DRILLING CONTRACTOR HONDO DRILLING CO. SPUD DATE 12/18/77 TYPE MUDDS RRINE		RIG NO. 3 NB NEW BIT RRB RERUN BIT CB CORE BIT CR CIRCULATE RETURNS NR NO RETURNS PR POOR RETURNS LAT LOGGED AFTER TRIP TG TRIP GAS CG CONNECTION GAS C CARBIDE DST DRILL STEM TEST I CORE INTERVAL		W MUD WEIGHT V MUD VISCOSITY F MUD FILTRATE <input type="checkbox"/> CC/30 MIN FC FILTER CAKE SD SAND CONTENT S SALINITY <input type="checkbox"/> G/G PPM R RESISTIVITY OF MUD RF RESISTIVITY MUD FILTRATE		WELL NO. 1-19 STATE FIELD COTTON LOCATION SEC 19 T19S R28E COUNTY, STATE EDDY COUNTY, NEW MEXICO API WELL INDEX NO. ELEVATION 1980 FNL, 2043 FWC DATE FROM 1-3-78 TO DEPTH FROM 6000 TO TD UNIT NO. #6 LOGGING GEOLOGISTS ROBERT R. CASAVANT ROBERT STOODARD	
CASING RECORD 13 7/8" AT 412' 8 5/8" AT 2482' HOLE SIZE 17 1/2" TO 412' 11" TO 2482' 7 7/8"		OIL Based on live oil in unwashed cuttings and percentage staining of washed cuttings.		GAS UNITS Gas Detector calibrated to record 100 units with a mixture of 2% methane-in-air.			
LITHOLOGY SYMBOLS <input type="checkbox"/> ME. <input type="checkbox"/> DOLO. <input type="checkbox"/> GYPSUM <input type="checkbox"/> SALT <input type="checkbox"/> COAL <input type="checkbox"/> CLAY <input type="checkbox"/> SHALE <input type="checkbox"/> SILT <input type="checkbox"/> SANDY <input type="checkbox"/> SAND <input type="checkbox"/> CONGL. <input type="checkbox"/> CHERT <input type="checkbox"/> VOL. <input type="checkbox"/> INTRU- ONE MITE AND ANHYDRITE AND LIGNITE STONE SILTST SAND OMERATE CANICS SIVE							



V-F PETROLEUM INC.

STATE "19" #1

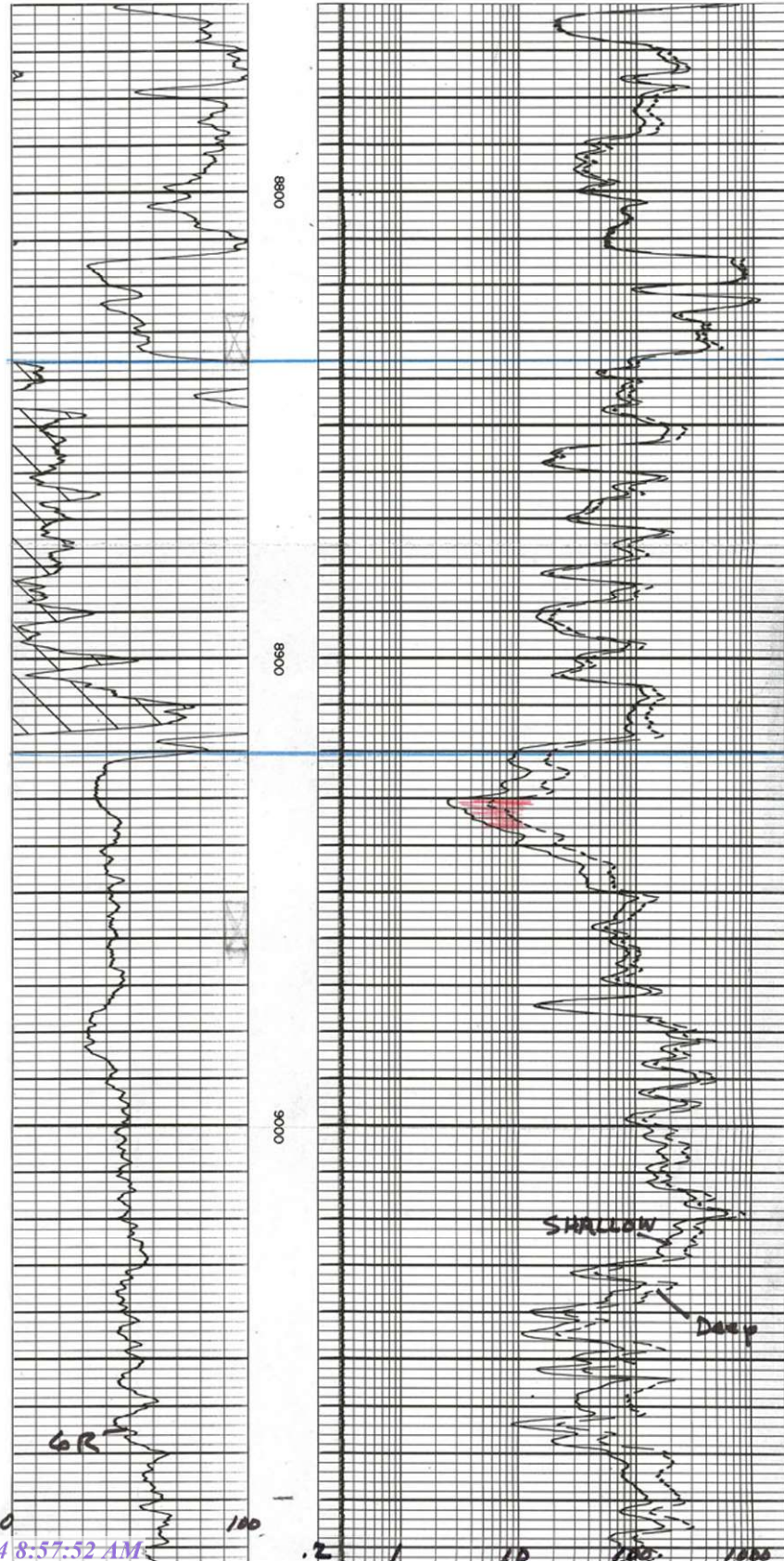
SECTION 19, T-19-S, R-28-E

1,980' FNL & 2,043' FWL

EDDY CO., NM

DUAL LATEROLOG

V-F Petroleum, Inc. Exhibits
Case Nos. 24279, 24280
Exhibit A-5



V-F PETROLEUM INC.

STATE "19" #1

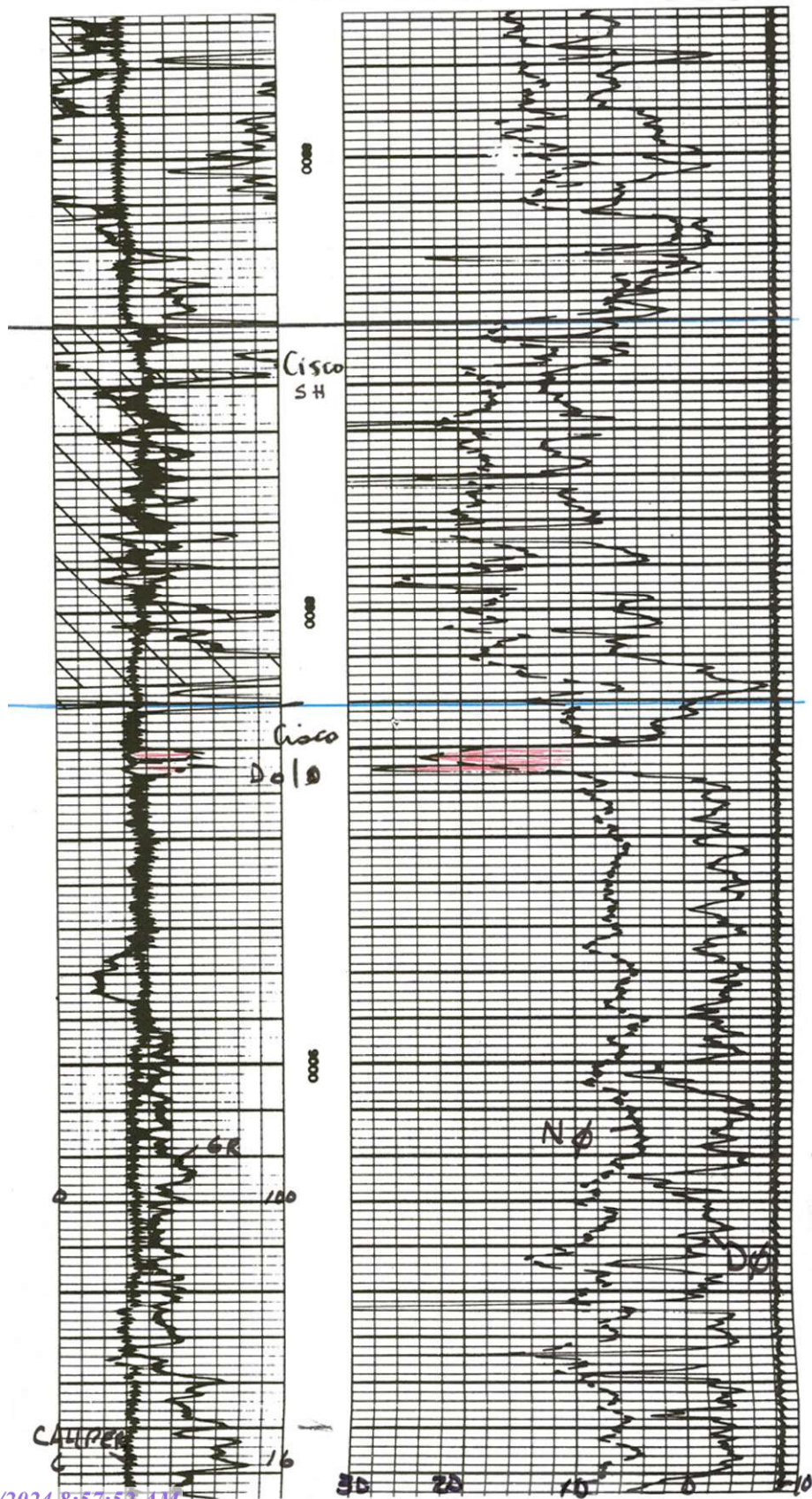
SECTION 19, T-19-S, R-28-E

1,980' FNL & 2,043' FWL

EDDY CO., NM

V-F Petroleum, Inc. Exhibits
Case Nos. 24279, 24280
Exhibit A-6

NEUTRON-DENSITY



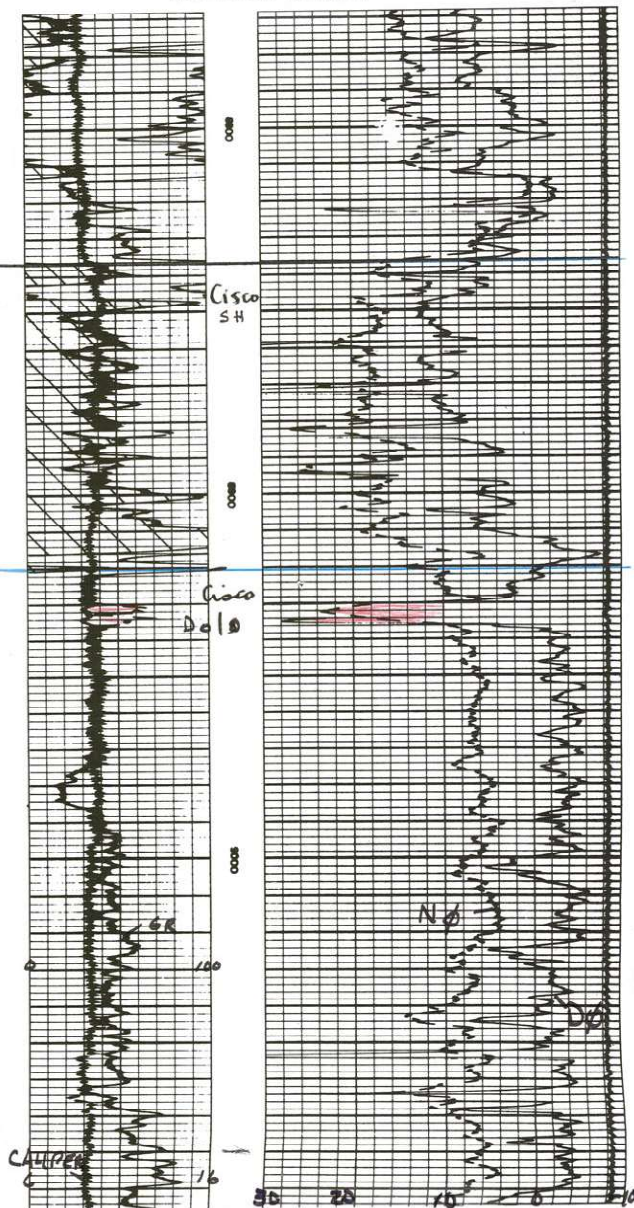
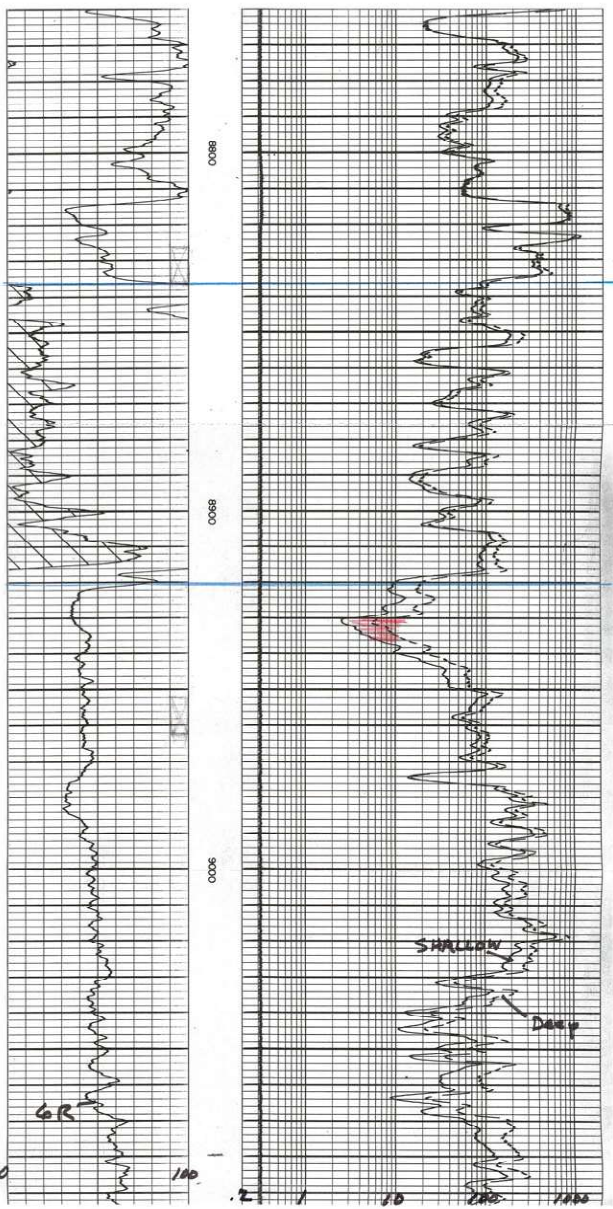
V-F PETROLEUM INC.
 STATE "19" #1
 SECTION 19, T-19-S, R-28-E
 1,980' FNL & 2,043' FWL
 EDDY CO., NM
 DUAL LATEROLOG

EXPLORATION LOGGING
 A GEOLOGICAL-ENGINEERING SERVICE

SOUTHLAND ROYALTY CO.
 EXPLORATION LOGGING
 WELL FILE

REMARKS		ABBREVIATIONS		COMPANY SOUTHLAND ROYALTY COMPANY	
DRILLING CONTRACTOR MONDO DRILLING CO.	HIC NO. 3	NR NEW BIT	W MUD WEIGHT	WELL NO. 1-19 STATE	
SPUD DATE 12/18/77		RR RETURN BIT	V MUD VISCOSITY	FIELD COTTON	
TYPE MUDD BRINE		CR CORE BIT	F MUD FILTRATE	LOCATION SEC 19 T19S R28E	
		CRS CIRCULE RETURNS	FC FILTER CAKE	COUNTY, STATE EDDY COUNTY, NEW MEXICO	
		NR NO RETURNS	SD SAND CONTENT	API WELL INDEX NO.	
		PR POOR RETURNS	S SALINITY	ELEVATION 1980 FNL, 2013 FWL	
		LAT LOGGED AFTER TRIP	X RPM	DATE FROM 1-3-78 TO	
		TO TRIP GAS	R RESISTIVITY OF MUD	DEPTH FROM 6000 TO TD	
		CG CONNECTION GAS	RT RESISTIVITY MUD FILTRATE	UNIT NO. #6	
		CH CHOKER		LOGGING GEOLOGISTS ROBERT R. CASAVANT ROBERT STOODARD	
		DST SMALL STREAM TEST			
		I DST INTERVAL			
		CORE INTERVAL			

DEPTH (FEET)	LITHOLOGY	DRILLING MUD			CUTTINGS		REMARKS AND LITHOLOGY DESCRIPTION
		CONTINUOUS	DITCH GAS	CHROMATOGRAPHIC ANALYSIS	GAS		
5		CG 16 U					V SLTY, MOD FIRM
10							
15							
20							
30							
40							
50							
60							
70							
80							
90							
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110							
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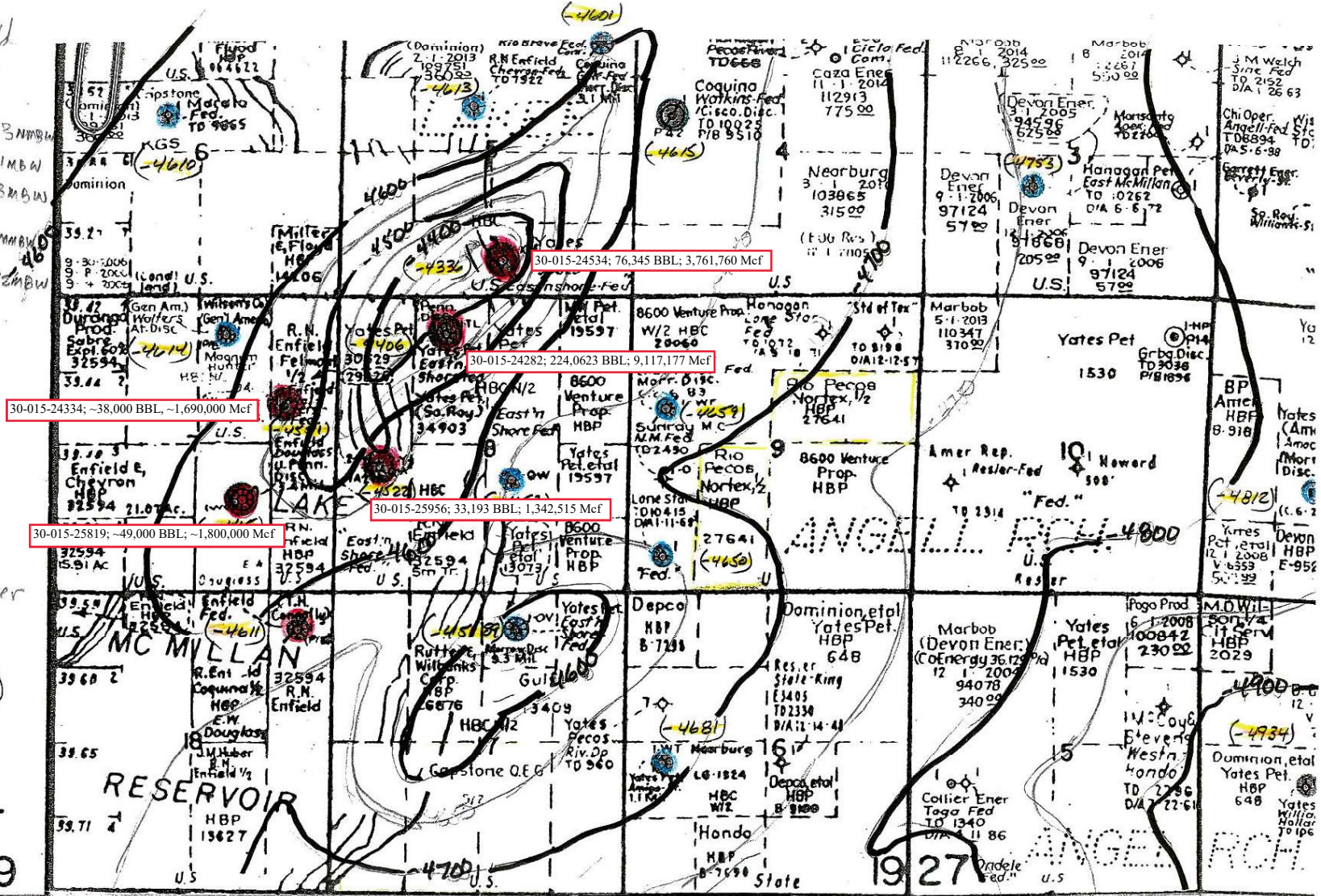


V-F Petroleum, Inc. Exhibits
Case Nos. 24279, 24280
Exhibit A-8

McMillian Cisco
Field

McMillian Field
(Cisco)

50	76MBD	3.7BCF	1.8MMBW
7H	38MBD	1.6ACF	91MBW
7J	49MBD	1.8BCF	73MBW
6C	224MBD	9.1ACF	1.4MMBW
BL	33MBD	1.3BCF	552MBW



● Cisco Producer

T/CISAO
(PAY ZONE)

STRUCTURE

Scale
1" = 2000'
C.I. = 60'

T
19