

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

**APPLICATIONS OF SELECT WATER
SOLUTIONS, LLC FOR APPROVAL
OF SALTWATER DISPOSAL WELLS,
LEA COUNTY, NEW MEXICO**

**CASE NOS. 25547-25548
25899 & 25900**

**PILOT WATER SOLUTIONS SWD, LLC'S RESPONSE TO SELECT WATER
SOLUTIONS, LLC's MOTION TO STRIKE AND REQUEST FOR LIMITED
ADDITIONAL TIME**

Pilot Water Solutions SWD LLC (“Pilot”), provides this Response to Select Water Solutions LLC’s (“Select”), Motion to Strike Pilot’s Entry of Appearance and further makes a limited request for additional time to provide data and information to the Oil Conservation Division (“OCD” or the “Division”) substantiating Pilot’s good-faith concern that Select’s proposed salt water disposal (“SWD”) wells may adversely affect Pilot’s existing operations and implicate matters within the Division’s statutory authority. Pilot respectfully requests that the Division decline to strike its appearance and allow Pilot a short, defined period to submit additional technical and regulatory information substantiating the operational impacts that Pilot reasonably believes are likely to result from Select’s proposed injection activities.

In support of this Response, Pilot submits sworn affidavits from its regulatory and engineering personnel, as well as limited publicly available regulatory records from the Texas Railroad Commission (“RRC”), demonstrating existing injection activity and pressure-related regulatory constraints affecting Pilot’s saltwater disposal operations in the Delaware Mountain Group (“DMG”) reservoir. These materials are submitted solely to illustrate the factual incompleteness of Select’s Motion and to support Pilot’s request for limited additional time. In support thereof, Pilot provides the following exhibits:

Exhibit A – Self-Affirmed Statement of David Grounds, Vice President for Regulatory Compliance, Pilot Water Solutions SWD, LLC

Exhibit B – Self-Affirmed Statement of Ankush Gupta, Senior Vice President for Engineering and Planning, Pilot Water Solutions SWD, LLC

Exhibit C – Selected RRC Annual Disposal/Injection Well Monitoring Reports (Form H-10) for Ross SWD 5

Exhibit D – Selected RRC Annual Disposal/Injection Well Monitoring Reports (Form H-10) for Ross SWD 9

Exhibit E – RRC Order Amending Ross SWD 5 UIC Permit (approved December 8, 2025)

I. BACKGROUND

Pilot was unaware of Select’s pending applications for approval of saltwater disposal wells in Case Nos. 25547, 25548, 25899, and 25900 until the week of January 26, 2026. Pilot did not receive notice of Select’s applications and did not otherwise learn of the proposed wells.

Although Select asserts that Pilot is not an “affected party” based on a rigid application of distance-based notice requirements, Select is fully aware that Pilot operates saltwater disposal infrastructure in the immediate vicinity of the proposed wells. Select and Pilot operate in the same regional disposal corridor, and Select knew or reasonably should have known that its proposed injection activities could implicate Pilot’s operations. Nothing in the Division’s rules prevented Select from providing courtesy notice to a nearby disposal operator whose operations may be affected, particularly where injection impacts are not constrained by artificial jurisdictional boundaries.

Upon learning of Select’s applications, Pilot promptly entered an appearance and lodged an objection based on preliminary concerns regarding the potential operational impacts of Select’s proposed wells. Pilot’s objection was filed in good faith and without delay once Pilot became aware of the applications.

In moving to strike Pilot’s appearance, Select relies on Area of Review exhibits and factual assertions that are incomplete and, in at least one material respect, inaccurate. Specifically, Select’s exhibits characterize the Ross SWD 9 as inactive. In fact, Ross SWD 9 is an active injection well, as reflected in publicly available records maintained by the Texas RRC. Pilot is in the process of

compiling and submitting documentation from the TX RRC confirming the current injection status of Ross SWD 9.

Select's submissions further omit material information regarding Ross SWD 5, which has resumed injection operations. The absence of Ross SWD 5 from Select's analysis materially understates the cumulative disposal activity occurring in the area and distorts the operational context in which Select's proposed wells must be evaluated.

Additionally, Select's Area of Review analysis draws an arbitrary demarcation at the New Mexico–Texas border to exclude Pilot's operations from consideration. Injection behavior, pressure communication, and operational interference do not recognize state boundaries. By treating the state line as a limiting principle for notice and impact analysis—particularly with respect to the Jackrabbit SWD—Select improperly minimizes the relevance of nearby Texas disposal wells that operate in the same disposal system and pressure regime.

Pilot's technical staff is actively assembling the necessary operational, injection, and pressure data to fully document these issues and present them to the Division. At present, however, it is clear that Select's Motion to Strike rests on an incomplete factual record and seeks to foreclose Pilot's participation before the Division has the benefit of accurate and complete information regarding nearby disposal operations.

II. SELECT'S MOTION MISSTATES THE GOVERNING LEGAL STANDARD FOR INTERVENTION

Select's Motion to Strike is legally deficient because it ignores the express language of 19.15.4.11(C) NMAC, which governs intervention in Division adjudicatory proceedings. That rule provides that an intervenor may remain a party either by demonstrating standing or by demonstrating that its participation will contribute substantially to the prevention of waste, protection of correlative rights, or protection of public health or the environment.

Select's Motion addresses only one prong of this rule—traditional standing—and fails entirely to address the alternative and independent basis for intervention expressly authorized by the Division's regulations. This omission alone is sufficient grounds to deny the Motion or, at a minimum, defer ruling until the Division has the benefit of a complete factual record.

Select's reliance on Order Nos. R-10987-A(2) and R-12811 (*In re Application of Gandy Corp.*, Case No. 13962 (N.M. Oil Conservation Div. Sept. 24, 2007)) is misplaced. Those orders denied intervention based on circumstances not present here, including the absence of any operational interest in the disposal reservoir, allegations of surface or environmental impacts outside the relevant zone of interest, speculative competitive concerns, and, in R-12811, a substantially delayed filing. By contrast, Pilot is an existing SWD operator injecting into the same DMG reservoir as Select's proposed wells and has identified credible, subsurface injection-related concerns directly tied to reservoir pressure management, waste prevention, and protection of correlative rights—matters squarely within the Division's core statutory responsibilities. At a minimum, these distinctions confirm that Select's cited orders do not compel striking Pilot's appearance at this preliminary stage.

Pilot's participation will contribute substantially to the Division's statutory duties because Pilot operates saltwater disposal wells injecting into the same disposal reservoir as Select's proposed wells and has already experienced regulatory constraints tied to reservoir pressure conditions. Evaluating cumulative injection impacts in a shared disposal formation falls squarely within the Division's mandate to prevent waste and protect correlative rights under NMSA 1978, § 70-2-11. In addition, the Division is “empowered to make and enforce rules, regulations and orders, and to do whatever may be reasonably necessary to carry out” its duty to prevent waste and protect correlative rights. NMSA 1978, § 70-2-11; *Santa Fe Expl. Co. v. Oil Conservation Comm'n*, 1992-NMSC-044, ¶ 28, 114 N.M. 103, 835 P.2d 819.

At a minimum, 19.15.4.11(C) NMAC vests the Division with discretion to allow Pilot to remain in the proceeding while Pilot completes its technical review and submits additional information relevant to these statutory considerations.

III. SELECT'S MOTION IS PREMATURE

Select's Motion rests almost entirely on a distance-based characterization of standing and incorrectly treats the Division's notice provisions as a jurisdictional bar to intervention, notwithstanding the express discretion afforded under 19.15.4.11(C) NMAC. That framing is premature. The Division's rules and practice do not require an objector to conclusively prove injury at the moment it enters an appearance. Rather, the Division routinely allows parties with a credible basis for concern to develop and submit supporting evidence, particularly where technical and subsurface impacts are at issue.

While Select relies on a one-half mile radius for notice purposes, its own application and prehearing materials consistently analyze potential impacts over a one-mile Area of Review and beyond. This confirms that the geographic scope of potential operational effects is broader than the notice radius Select now treats as dispositive for standing.

Select's Motion is further premised on factual assumptions that are demonstrably incomplete. As reflected in publicly available RRC records submitted with this Response, Ross SWD 5 and Ross SWD 9 are active disposal wells injecting into the same DMG reservoir. Ross SWD 5 was shut in for a portion of 2024–2025 due to elevated reservoir pressures and recently resumed injection pursuant to a December 2025 permit amendment that increased allowable injection pressure while reducing authorized daily injection volume. These records underscore that reservoir pressure constraints already exist in the area and confirm that Pilot's concerns are grounded in present operational realities, not speculation.

Pilot has identified legitimate concerns regarding injection interference, pressure

communication, and operational constraints affecting its disposal operations. Those concerns are currently under technical review. Striking Pilot's appearance before that review is complete would deprive the Division of potentially relevant information and would elevate form over substance.

IV. PILOT HAS A GOOD-FAITH BASIS TO BELIEVE IT IS AFFECTED BY SELECT'S PROPOSED WELLS

The attached RRC regulatory records further demonstrate that Pilot's concerns arise from existing injection pressures and recent regulatory constraints affecting the DMG reservoir, reinforcing the need for additional time to assemble and present a complete technical record. Pilot's operational staff has identified specific characteristics of Select's proposed wells—including their location, proposed injection parameters, and disposal formations—that reasonably warrant further evaluation. While Pilot is still assembling the supporting data, these characteristics create a credible basis to believe that Select's operations may impact Pilot's existing or planned disposal activities. Pilot is merely asking for a short opportunity to document them. Independently, Pilot's participation will contribute substantially to the Division's evaluation of cumulative injection impacts in a shared disposal reservoir, an issue directly tied to the prevention of waste and protection of correlative rights. The affidavits submitted as **Exhibits A and B** and the regulatory records submitted as **Exhibits C–E** further demonstrate that Pilot's concerns arise from existing injection pressures and recent regulatory constraints affecting the DMG reservoir, reinforcing the need for additional time to assemble and present a complete technical record.

V. REQUEST FOR LIMITED ADDITIONAL TIME

Under 19.15.4.11(C) NMAC, the Division Examiner has discretion to deny Select's Motion to Strike where an intervenor's participation will contribute substantially to the Division's statutory duties, even where standing is disputed. Pilot respectfully requests that the Division deny Select's Motion to Strike or, in the alternative, defer ruling and allow Pilot a limited period of time

to submit supplemental affidavits and technical materials addressing the operational impacts raised by Select's applications.

Granting this limited request will not prejudice Select. It will ensure that the Division's decision is informed by a complete record and that potentially affected operators are not excluded before technical issues can be fully evaluated.

VI. CONCLUSION

Pilot has reason to believe that it is an affected party, or at a minimum that its participation will contribute substantially to the Division's statutory duties, and has articulated good-faith concerns grounded in existing reservoir pressure conditions and regulatory constraints affecting its operations. Pilot respectfully requests that the Division deny Select's motion or alternatively, defer ruling on Select's motion so that Pilot has time to provide the Division additional information substantiating its claims.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By: 

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Attorneys for Pilot Water Solutions SWD,
LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served to counsel of record by electronic mail this 3rd day of February 2026, as follows:

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Rachael Ketchledge

EXHIBIT A

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

APPLICATION OF SELECT WATER
SOLUTIONS, LLC FOR APPROVAL OF
SALTWATER DISPOSAL WELLS, LEA
COUNTY, NEW MEXICO

CASE NOS. 25547 - 25548
25899 & 25900

SELF-AFFIRMED STATEMENT OF DAVID GROUNDS

I, David Grounds, state the following:

1. My name is David Grounds, and I am employed by Pilot Water Solutions SWD, LLC (“Pilot”) as Vice President for Regulatory Compliance. I am over 18 years of age, have personal knowledge of the matters addressed herein, and I am competent to provide this self-affirmed statement.
2. I have not previously testified before the New Mexico Oil Conservation Division (“Division”), and my qualifications as an expert in oil and gas regulatory compliance/injection operations and permitting have not been accepted and made a matter of record. A copy of my current resume is attached at the end of this statement.
3. I am familiar with the Division’s regulations concerning saltwater disposal (“SWD”) wells, including requirements related to injection pressures, monitoring and reporting obligations, seismic response protocols, and ongoing compliance responsibilities imposed on SWD operators.
4. I am familiar with the applications filed by Select Water Solutions, LLC (“Select”) in the above-captioned cases and with the regulatory requirements applicable to the approval and operation of the proposed SWD wells.

EXHIBIT A

5. I have several years of experience in oil and gas regulatory matters, and I have worked directly or in a supervisory role in the geographic areas where Select proposes to drill the Javelina Fed 4 SWD #1, the Jackrabbit Fed SWD #1, the Coyote Fed 14 SWD #1, and the Roadrunner Fed 26 SWD #1.

6. Select did not provide Pilot with notice of the above-referenced applications, either informally or pursuant to the Division's notice requirements, and Pilot did not become aware of these applications until recently.

7. Based on my initial regulatory review, it is my professional opinion that Select's proposed SWD wells may create operational and compliance impacts for Pilot, including increased pressure interaction or other interference that could trigger reporting obligations, require temporary or permanent shut-ins, necessitate amendments to Pilot's existing SWD permits, or expose Pilot to regulatory scrutiny or enforcement that is not of Pilot's making.

8. Though I am not an attorney, it is my view that Select's analysis of standing is overly reliant on half-mile mapping and further fails to address cumulative and operational impacts in the geographic vicinity.

9. From a regulatory compliance perspective, Pilot is concerned that approval of Select's applications without further evaluation could result in reduced operational flexibility, increased compliance costs, and the risk of forced curtailment of Pilot's disposal operations.

10. As a matter of regulatory practice, Pilot cannot responsibly assert, waive, or fully characterize potential injection-related impacts without first assembling and reviewing relevant technical and operational data. Reaching conclusions without that information risks mischaracterizing potential impacts or omitting information the Division would reasonably expect an operator to evaluate.

EXHIBIT A

11. Pilot is currently in the process of conducting additional due diligence regarding Select's proposed wells and believes it will be able to substantiate these regulatory concerns if afforded a reasonable period of time to complete that review and submit supporting information to the Division.

12. I affirm that to the best of my knowledge and belief, all of the matters set forth herein are true, correct, and accurate and made under penalty of perjury under laws of the State of New Mexico.

[Remainder of page left intentionally blank]

EXHIBIT A

FURTHER AFFIANT SAYETH NOT.

Dated this 3rd day of February, 2026.



David Grounds
Pilot Water Solutions SWD, LLC

STATE OF Texas)
)
) ss.
CITY OF Harris)

The foregoing instrument was subscribed and sworn to before me this 3rd day of February, 2025, by David Grounds, Vice President for Regulatory Compliance for Pilot Water Solutions SWD, LLC.

Witness my hand and official seal.

My commission expires: 12-19-2027

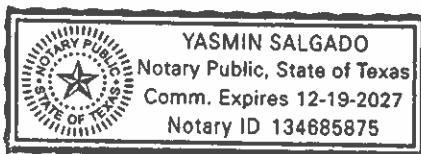


EXHIBIT A

DAVID GROUNDS

Health, Safety, Environmental, and Regulatory Leader

817-897-0135 | davidgrounds@att.net | Dallas, TX

PROFESSIONAL SUMMARY

Accomplished health, safety, environmental (HSE), and regulatory executive with 20+ years of experience developing and driving safety, environmental, occupational health, wellness, chemical management, and regulatory compliance programs. Skilled in applying expertise in OSHA, RRC, TCEQ, BLM, NMSLO, NMOCD, EPA, MSHA and DOT regulatory requirements to define, develop, and evaluate programs, policies, and procedures in the oil and gas industry that maintain compliance. Collaborative, servant leader who fosters a strong HSE culture and executes regulatory compliance.

CORE COMPETENCIES

- HSE Strategic Planning
- HSE Program Development
- Regulatory Permits and Filings
- Emergency Preparedness
- Project Management
- Process Safety Management
- Environmental Compliance
- DOT Compliance
- Recruiting and Driver Quals
- Risk Analysis/Management
- Evaluations/Audits
- Gas Monitor Program
- KPI/Metrics Tracking and Analysis
- Executive/Stakeholder Engagement
- Government Relations and Sustainability

PROFESSIONAL EXPERIENCE

Pilot Water Solutions, LLC

Vice President, Regulatory Compliance & Quality, Health, Safety, and Environment (QHSE)

Jan 2021 – current

- Manages all permitting activities for air, environmental, recycling, reuse, and injection operations for a nationwide midstream water disposal provider. Secured scores of permits and managed an annual budget of over \$3MM.
- Develops the organization's regulatory strategy on permitting in new development projects. Evaluates business risk and operating climate to identify, assess, and select new development areas.
- Constructed the initial ESG strategy and internal benchmarks.
- Manages all federal, state, and local environmental and regulatory reporting across 1,110+ miles of water pipeline, 135 saltwater disposal wells, 29 source water and recycling facilities.
- Manages all government affairs with federal and state bodies and officials, including permitting, operational planning, reporting, government affairs, and special inquiries.
- Participate in industry memberships and trade associations.
- Served as the corporate representative for all agencies hearings and required depositions.
- Managed all aspects of the organization's QHSE program; established the principles, requirements, practices, and methods for integrating quality, health, and safety into daily operations.
- Designed and implemented an end-to-end QHSE management system to improve process and product quality, control environmental impact to promote sustainability, and ensure worker health and safety.

Vice President, DOT Compliance & Recruiting

Oct 2021 – Dec 2023

- Managed a team of four driver attraction recruiting professionals.
- Managed all aspects of recruiting efforts, KPIs, and overall recruiting needs.
- Recruited on average of 600 drivers YoY.
- Served as the corporate representative for all agencies hearings and required depositions.

H₂O Midstream, LLC

Director, Health, Safety, Environmental, and Regulatory (HSER)

2017 – 2022

- Designed and implemented a comprehensive health, safety, environmental and regulatory program; defined, developed, and managed programs and initiatives that secure optimal levels of safety and ensure full compliance with industry, local, state, and federal regulatory standards and requirements.
- Oversaw all environmental management program procedures from development through to maintenance, including managing Tier II reporting, PBR, waste characterization and streams, wetlands, jurisdictional waters and floodplains, cultural resources and endangered species surveys, SWPPP, NORM, and SPCC.
- Designed, developed, and implemented a top-tier training and hazard recognition program, delivering metric-driven dynamic hazard recognition, competency-based and hands-on training that has significantly enhanced organization's capacity to work safer, and more efficiently.

EXHIBIT A

- Successfully maintained an injury-free workplace, and zero OSHA-recordable incidents since the organization's inception.
- Led a \$2MM cleanup following a major spill and saved the company \$450M by working with the landowners to provide creative remediation solutions.
- Leveraged regulatory knowledge to transition from a permitted to a nonpermitted required recycling facility saving \$150M annually on the cost of bond and additional administrative duties across multiple facilities.
- Developed and implemented a preventative maintenance schedule, ensuring zero engine failures; met customer transfer point contractual meter calibration requirements, and reduced YoY R&M by 30%.

EOG Resources, Inc.

Environmental, Health, and Safety Consultant

2007 – 2017

- Built, designed, and implemented a safety and health program for a three-business unit division; authored the first process safety manual and general safety guidelines.
- Developed and implemented a cutting-edge health monitoring program for silica monitoring that included medical surveillance, initial physicals, and quantitative fit test respirators. Establishing a relationship with Johns Hopkins University to interpret chest x-rays and serve as company repository.
- Drove significant improvement in health and safety training culture, achieving a 100% monthly training metric in a division of 700 employees and 600 contractors.
- Planned and executed quantitative fit-testing and medical surveillance processes for workplace health hazards, including chemical/toxin exposure, and bloodborne pathogens.
- Led Shared Services business unit and achieved 1 million man-hours without a recordable injury.
- Implemented fundamental health and safety programs and initiatives that delivered an 87% injury rate reduction.

Nabors Drilling USA, LP

Health, Safety, and Environmental Supervisor

2003 – 2007

- Steered HSE programs across 26 drilling rigs and 650 employees. Oversaw a team of five operational safety trainers and 20 safety coaches.
- Designed and developed engaging and effective worker-specific training programs many of which were rolled-out company-wide.
- Built a strong HSE foundation and effectively executed on fundamentals; implemented monitoring, tracking, and evaluating programs and practices to maintain and enhance standards, resulting in a 70% injury rate reduction.

EDUCATION

M.S., Occupational Safety and Health – HSE Management, Columbia Southern University, 2012

B.S., Occupational Safety and Health – HSE Management, Cum Laude, Columbia Southern University, 2010

A.S., General Studies – Technical Writing, North Central Texas College, 2002

TRAINING

PEC Basic Orientation Trainer, 2017

Well Control Supervisor, 2007

PEC H2S Clear Trainer, 2017

DuPont STOP Trainer, 2006

Fall Protection Trainer, 2013

Taproot Trainer, 2006

Smith Driving Trainer, 2010

Bobby Jones Trainer, 2006

AWARDS and ACHIEVEMENTS

Texas Seismicity & Water Partnership, Technical Committee Ambassador, 2023

Texas Alliance of Energy Producers, Committee Member, 2023

Permian Basin Producers Association, Committee Member, 2023

NTEPS, Executive Committee Representative, 2009-2011

Division Leadership Champion, EOG Resources, 2008-2012

S&E Excellence Award, EOG Resources, 2007

Safety Leadership MVP, Nabors Drilling, 2006

EXHIBIT B

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

APPLICATION OF SELECT WATER
SOLUTIONS, LLC FOR APPROVAL OF
SALTWATER DISPOSAL WELLS, LEA
COUNTY, NEW MEXICO

CASE NOS. 25547 - 25548
25899 & 25900

SELF-AFFIRMED STATEMENT OF ANKUSH GUPTA

I, Ankush Gupta state the following:

1. My name is Ankush Gupta and I am employed by Pilot Water Solutions SWD, LLC (“Pilot”) as Senior Vice President for Engineering and Planning. I am over 18 years of age, have personal knowledge of the matters addressed herein, and I am competent to provide this self-affirmed statement.

2. I have 18 years of experience in oil and gas operations, including the planning, construction, operation, and monitoring of saltwater disposal (“SWD”) wells. My responsibilities include evaluating injection capacity, monitoring pressure behavior, and assessing operational risks associated with nearby injection activity.

3. I have not previously testified before the New Mexico Oil Conservation Division (“Division”), and my qualifications as an expert in oil and gas injection operations and permitting have/have not been accepted and made a matter of record. A copy of my current resume is attached at the end of this statement.

4. I am familiar with Pilot’s existing and planned SWD operations in the geographic area surrounding the locations where Select Water Solutions, LLC (“Select”) proposes to drill the Javelina Fed 4 SWD #1, the Jackrabbit Fed SWD #1, the Coyote Fed 14 SWD #1, and the Roadrunner Fed 26 SWD #1.

EXHIBIT B

5. I am familiar with the applications filed by Select in the above-captioned cases and with the operational information provided in support of those applications, including Area of Review materials and proposed injection parameters.

6. Based on my initial review, Select's proposed SWD wells are located in proximity to Pilot's disposal operations such that there is a reasonable potential for operational interaction, including pressure communication, interference with injection capacity, or other impacts affecting Pilot's ability to operate its SWD facilities.

7. In my experience, operational impacts from SWD injection are not determined solely by linear distance, but are influenced by formation continuity, injection volumes and pressures, cumulative disposal activity, and existing pressure conditions in the disposal interval.

8. Evaluating the potential operational impacts of Select's proposed wells on Pilot's operations requires additional technical review, including analysis of historical injection data, pressure trends, formation characteristics, and cumulative disposal activity in the area.

9. Pilot is currently in the process of assembling and reviewing this information. Until that review is complete, it would be premature to definitively quantify the extent of any operational impacts; however, the proximity and characteristics of Select's proposed wells warrant further evaluation.

10. If Select's proposed wells are approved without additional analysis, Pilot is concerned that its disposal operations could be adversely affected, including through reduced injection capacity, operational constraints, or the need to modify existing disposal practices.

11. From an operational standpoint, Pilot cannot responsibly assess or rule out these potential impacts without completing its technical due diligence and presenting the resulting information to the Division.

EXHIBIT B

12. Pilot believes it will be able to substantiate its operational concerns regarding Select's proposed wells if afforded a reasonable period of time to complete its technical evaluation and submit supporting materials.

13. I affirm that to the best of my knowledge and belief, all of the matters set forth herein are true, correct, and accurate and made under penalty of perjury under laws of the State of New Mexico.

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EXHIBIT B

FURTHER AFFIANT SAYETH NOT.

Dated this 3rd day of February, 2026.



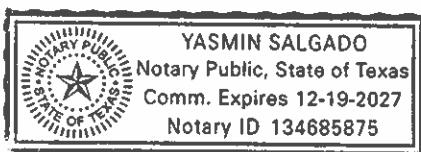
Ankush Gupta
Pilot Water Solutions SWD, LLC

STATE OF Texas)
) ss.
CITY OF Harris)

The foregoing instrument was subscribed and sworn to before me this 3rd day of February, 2026, by Senior Vice President for Engineering and Planning for Pilot Water Solutions SWD, LLC.

Witness my hand and official seal.

My commission expires: 12-19-2027



ANKUSH GUPTA

ENGINEERING AND OPERATIONS LEADER

832.948.2648

ank_gupta@outlook.com

Sugarland, TX

[LinkedIn](#)

PROFESSIONAL SUMMARY

Visionary, results-driven leader known for turning strategy into execution, driving operational excellence, and positioning organizations for market leadership. Proven ability to optimize production, minimize costs, and execute complex capital projects with precision. Expert in harnessing technology and refining operations to unlock multimillion-dollar value across global energy infrastructure. Accelerate efficiency, profitability, and competitive advantage by cultivating high-performance teams, forging strategic partnerships, and driving seamless cross-functional collaboration.

ADVANCED TECHNICAL TRAINING & CERTIFICATIONS

- PetroSkills Training:** Artificial Lift, Production Operations I & II, Gas Production Engineering, Production Surface Equipment
- Specialized Drilling & Engineering Courses:** BP-Chevron Drilling & Directional Drilling, Blade Casing Design, Halliburton Geomechanics, K&M ERD School, TH Hill Drill String Design
- Industry-Specific Training:** Liners, Bits, Mud, Cementing, Gas Deliquification
- Field Experience:** Drilling wellsite manager experience in 2011. Onsite operations exposure across NE British Columbia, Alberta, Pennsylvania, South Texas, and the Permian Basin

WORK EXPERIENCE

Pilot Water Solutions | Jun 2023 - Present

Senior VP, Engineering, Planning & Operations (Promoted from VP after 6 months)

- Manage 140+ SWDs and 1,100 miles of pipeline across TX, OH, WY, and UT, directing operations for 1 MMBbl/d of produced water and associated oil.
- Deliver CAPEX/OPEX projects on schedule and under budget while reducing facility downtime and enhancing system utilization through targeted maintenance and data analytics.
- Exceed KPIs by optimizing drilling, standardizing facility/pipeline designs, and revamping operation processes.
- Eliminated rental generators and refined chemical program to reduce OPEX by \$0.02/bbl and boost revenue.
- Integrate innovative technologies to reinforce competitive advantage and uphold operational excellence.
- Directed drilling, completions, and workover programs, advancing operational objectives and reinforcing asset integrity.
- Served as board member at Pilot Water Solutions, participating in board meetings and reporting directly to the CEO.

Ecopetrol Permian LLC | Jun 2020 - Jun 2023

Production & Facilities Manager

- Commanded production of 70,000 BOEPD in a high-profile joint venture with Occidental Oil and Gas, driving new performance frontiers in the Midland Basin.
- Directed engineering teams in Houston and integrated efforts with Occidental secondees to oversee more than 250 wells and six mission-critical facilities.
- Drove ambitious emissions tracking and reduction initiatives while orchestrating advanced water management programs.
- Engineered robust real-time dashboards to monitor CAPEX, flowback, production metrics, artificial lift performance, failure data, emissions, and water disposal/recycling.

- Spearheaded a groundbreaking collaboration with Accenture, AWS, and Occidental to introduce the industry's first water usage tracking application, radically elevating recycling efficiency.
- Garnered Ecopetrol's Excellence Award for pioneering an emissions baseline that redefined operational benchmarks across the joint venture.
- Participated in board meetings at Ecopetrol Permian, reporting directly to the CEO.

Sanchez Oil & Gas | Aug 2019 - Jun 2020

Area Production Manager, Eagleford (Catarina & Maverick Assets)

- Directed 600+ wells and nine major facilities with 100% working interest, driving 35,000 net BOEPD production.
- Managed a \$2.5MM monthly LOE budget, implementing cost-reduction strategies without compromising production output.
- Instituted a behavior-based safety program, significantly reducing TRIR and strengthening workplace culture.
- Led drilling, artificial lift optimization (gas lift, plunger lift, rod pumps), and root cause failure analyses to enhance asset reliability.
- Established SOPs for flowback and mobile compressor operations, standardizing operational excellence across the organization.
- Managed multiple workover rigs, overseeing downhole interventions.

Lead Production Engineer (Eagleford Asset) | Apr 2018 - Aug 2019

- Oversaw 450 wells in South Texas, representing 65% of Sanchez's total production.
- Optimized artificial lift systems, supervised workover rigs, and mentored production teams.
- Deployed offset frac mitigation with pre-load strategies to safeguard parent well productivity.
- Collaborated with completions, reservoir, and subsurface teams to manage proppant transfer via tracer studies and downhole gauges.
- Converted multiple plunger lift wells to gas lift, boosting output through favorable gas to liquids ratios.
- Managed five major gas and liquid handling facilities, ensuring robust infrastructure and stable operations.

Repsol/Equinor (Houston & Austin) | Jul 2013 - Apr 2018

Production/Operation/Midstream Engineer (Eagleford Asset)

- Hand-picked to represent Repsol in Equinor's unconventional South Texas operations, steering 200+ wells, three central distribution plants, and two high-capacity transfer stations.
- Teamed with reservoir, geology, facilities, and completions experts to overcome high H2S hurdles, enhance flowback methods, and shape strategic field development.
- Deployed advanced artificial lift solutions and orchestrated well workovers to amplify production performance, developing custom plunger-lift strategies for 70+ wells and optimizing gas-lift/rod-pump efficiency.
- Piloted a plant automation initiative that significantly reduced monthly OPEX/LOE, leveraging cross-functional alignment for maximum impact.
- Drove facility debottlenecking efforts to maintain seamless growth and uphold operational excellence.

Talisman Energy USA Inc. (Acquired by Repsol in 2015) | Pittsburgh, Houston & Calgary

Drilling Engineer (WEIS, COE & Appalachia Group) | May 2009 - Jul 2013

- Delivered well planning and execution for unconventional shale plays across Montney, Marcellus, and Eagle Ford.
- Directed up to four rigs simultaneously, overseeing AFE development and drilling operations.
- Optimized multi-well pad drilling, addressing horizontal well challenges to cut cycle times.
- Led offset analysis for new Alberta and BC plays within the Center of Excellence.
- Engineered casing design, torque & drag analysis, hydraulics, and bit performance in NE BC wells.
- Spearheaded drilling cost-reduction initiatives; earned multiple awards for cutting expenses and execution time.

EDUCATION

Bachelor of Engineering and Management, Mechanical Co-op

McMaster University, Hamilton, Ontario - 2009

General Management Program (In Progress) – Wharton School, University of Pennsylvania Expected Completion: Mid 2026 (Upon Completion, Wharton Alumni)

EXHIBIT C

RAILROAD COMMISSION OF
TEXAS
OIL AND GAS DIVISION

H-10

TYPE OR PRINT IN BLUE OR BLACK INK. SEE
RRC WEBSITE FOR FILING INSTRUCTIONS.

Return the completed original report to:
DIRECTOR, Technical Permitting
Oil and Gas Division
P.O. Box 12967
Austin, Texas 78711-2967

Annual Disposal/Injection
Well Monitoring Report

RRC USE ONLY

UIC Control No: 000119379
Type: 1
DUE DATE: 06/01/2025

1. OPERATOR NAME, exactly as shown on P-5 PILOT WATER GATH DELAWARE LLC		2. OPERATOR P-5 NO. 665590		3. RRC DISTRICT NO. 08			
4. ADDRESS, including city, state, and zip code 20 GREENWAY PLAZA STE 500 HOUSTON, TX 77046				5. API NO. 42-301-34491			
				6. OIL LEASE NO. 56168			
7. FIELD NAME, exactly as shown on Proration Schedule DIMMITT (DELAWARE)				8. GAS ID NO.			
9. LEASE NAME, exactly as shown on Proration Schedule ROSS SWD		10. COUNTY LOVING		11. WELL NO. 5			
12. MONTH YR	13. INJECTION PRESSURE		14. TOTAL VOLUME INJECTED		15. ANNULUS PRESSURE (BETWEEN TUBING AND CASING) [See instructions (item B)]		
	AVG PSIG	MAX PSIG	BBLS	MCF	# OF READINGS	MIN PSIG	MAX PSIG
05/2024	1273	1304	284406	0	31	0	0
06/2024	1296	1324	242254	0	30	0	0
07/2024	1110	1173	393450	0	31	0	0
08/2024	1289	1302	249090	0	31	0	0
09/2024	1277	1291	185972	0	30	0	0
10/2024	1289	1301	189569	0	31	0	0
11/2024	1267	1277	158901	0	30	0	0
12/2024	1242	1251	47715	0	31	0	0
01/2025	1247	1254	0	0	31	0	0
02/2025	1239	1245	0	0	29	0	0
03/2025	1246	1251	0	0	31	0	0
04/2025	1267	1280	0	0	30	0	0
16. Completed Injection Interval (perforated or open hole interval): FROM: 5,324 ft TO: 7,684 ft					17. Depth of Tubing Packer: 5,298 ft		
18. Are the injected fluids produced from sources other than your own ? <input checked="" type="checkbox"/> 1. YES <input type="checkbox"/> 2. NO			19. Injection through: <input checked="" type="checkbox"/> 1. Tubing <input type="checkbox"/> 2. Casing				
20. Type of fluids injected during reporting cycle: Total Anthropogenic							
A Salt Water 100 % B Fresh Water ____ % C Fracture Water Flow Back ____ % D Norm ____ % E(a) CO2 ____ % E(a) CO2 ____ %							
F Natural Gas ____ % G H2S ____ % H Polymer ____ % I Steam ____ % J Air ____ % K Nitrogen ____ %							
L Other Fluid ____ % Specify Fluid _____							
This facsimile H-10 was generated electronically from data submitted to the RRC. A certification of the automated data is available in the RRC's Austin office.		Name of Person: <u>Tami Parker</u> Phone: (432)-296-2053					
Company: <u>PILOT WATER SOLUTIONS SWD LLC</u>		Date: <u>06/18/2025</u>					

EXHIBIT D
 RAILROAD COMMISSION OF
 TEXAS
 OIL AND GAS DIVISION

H-10

TYPE OR PRINT IN BLUE OR BLACK INK. SEE
 RRC WEBSITE FOR FILING INSTRUCTIONS.

Return the completed original report to:
 DIRECTOR, Technical Permitting
 Oil and Gas Division
 P.O. Box 12967
 Austin, Texas 78711-2967

**Annual Disposal/Injection
 Well Monitoring Report**

RRC USE ONLY

UIC Control No: 000124802
 Type: 1
 DUE DATE: 06/01/2025

1. OPERATOR NAME, exactly as shown on P-5 PILOT WATER GATH DELAWARE LLC		2. OPERATOR P-5 NO. 665590		3. RRC DISTRICT NO. 08			
4. ADDRESS, including city, state, and zip code 20 GREENWAY PLAZA STE 500 HOUSTON, TX 77046				5. API NO. 42-301-00000			
				6. OIL LEASE NO.			
7. FIELD NAME, exactly as shown on Proration Schedule				8. GAS ID NO.			
9. LEASE NAME, exactly as shown on Proration Schedule ROSS SWD		10. COUNTY LOVING		11. WELL NO. 9			
12. MONTH YR	13. INJECTION PRESSURE		14. TOTAL VOLUME INJECTED		15. ANNULUS PRESSURE (BETWEEN TUBING AND CASING) [See instructions (item B)]		
	AVG PSIG	MAX PSIG	BBLS	MCF	# OF READINGS	MIN PSIG	MAX PSIG
05/2024	1530	1642	518921	0	31	0	0
06/2024	1578	1662	549925	0	30	0	0
07/2024	1516	1597	444210	0	31	0	0
08/2024	1620	1697	532179	0	31	0	0
09/2024	1588	1670	452577	0	30	0	0
10/2024	1624	1700	531216	0	31	0	0
11/2024	1529	1642	404726	0	30	0	0
12/2024	1482	1558	343239	0	31	0	0
01/2025	1648	1725	460846	0	31	0	0
02/2025	1628	1692	118683	0	29	0	0
03/2025	1666	1713	404621	0	31	0	0
04/2025	1626	1722	433376	0	30	0	0
16. Completed Injection Interval (perforated or open hole interval): FROM: 5,345 ft TO: 7,700 ft					17. Depth of Tubing Packer: 5,251 ft		
18. Are the injected fluids produced from sources other than your own ? <input checked="" type="checkbox"/> 1. YES <input type="checkbox"/> 2. NO			19. Injection through: <input checked="" type="checkbox"/> 1. Tubing <input type="checkbox"/> 2. Casing				
20. Type of fluids injected during reporting cycle:							
A Salt Water 100 % B Fresh Water 0 % C Fracture Water Flow Back 0 % D Norm 0 % E(a) CO2 0 % E(a) CO2 0 %							
F Natural Gas 0 % G H2S 0 %		H Polymer 0 %		I Steam 0 %		J Air 0 % K Nitrogen 0 %	
L Other Fluid 0 % Specify Fluid _____							
This facsimile H-10 was generated electronically from data submitted to the RRC. A certification of the automated data is available in the RRC's Austin office.		Name of Person: Tami Parker				Phone: (432)-296-2053	
Company: PILOT WATER GATH DELAWARE LLC		Date: 06/18/2025					

JIM WRIGHT, CHAIRMAN
 CHRISTI CRADDICK, COMMISSIONER
 WAYNE CHRISTIAN, COMMISSIONER



DANNY SORRELLS
 DEPUTY EXECUTIVE DIRECTOR
 DIRECTOR, OIL AND GAS DIVISION
 PAUL DUBOIS, P.E.
 ASSISTANT DIRECTOR, TECHNICAL PERMITTING

RAILROAD COMMISSION OF TEXAS

OIL AND GAS DIVISION

PERMIT TO DISPOSE OF NON-HAZARDOUS OIL AND GAS WASTE BY INJECTION INTO A POROUS FORMATION NOT PRODUCTIVE OF OIL AND GAS

PERMIT NO. 16380 AMENDMENT

PILOT WATER GATH DELAWARE LLC
 20 GREENWAY PLAZA STE 500
 HOUSTON TX 77046

Authority is granted to inject Non-Hazardous Oil and Gas waste into the well identified herein in accordance with Statewide Rule 9 of the Railroad Commission of Texas and based on information contained in the application (Form W-14) dated April 21, 2025, for the permitted interval(s) of the BELL CANYON and CHERRY CANYON formation(s) and subject to the following terms and special conditions:

ROSS SWD (56168) LEASE
 DIMMITT (DELAWARE) FIELD
 LOVING COUNTY
 DISTRICT 08

WELL IDENTIFICATION AND PERMIT PARAMETERS:

Well No.	API No.	UIC No.	Permitted Fluids	Top Interval (feet)	Bottom Interval (feet)	Maximum Liquid Daily Injection Volume (BBL/day)	Maximum Surface Injection Pressure for Liquid (PSIG)
5	30134491	000119379	Salt Water; Other Non-Hazardous O/G Waste	5300	7700	30000	1666

SPECIAL CONDITIONS:

Well No.	API No.	Special Conditions
5	30134491	<p>1. Bottomhole Pressure (BHP) data:</p> <p>(1) The operator shall collect and report initial and periodic static bottomhole pressure (BHP) measurements. All bottomhole pressures should be depth adjusted to the top of the permitted injection interval. The BHP shall be collected in accordance with the following:</p> <ul style="list-style-type: none"> i. Initial static bottomhole pressure prior to injection. This value will be used as the initial average reservoir pressure for the well. ii. Initial bottomhole fracturing pressure (or frac gradient) of the permitted injection interval before injection into the well begins. iii. On a semiannual basis the operator will report the following two data points: <ul style="list-style-type: none"> a. A bottomhole pressure value for instantaneous shut in pressure (ISIP) measured including last measured injection rate immediately prior to shut-in. b. A static bottomhole reservoir pressure obtained after a minimum of four- (4) hours of shut-in after injection is stopped. <p>(2) The operator shall collect daily injection volume and daily surface injection pressure data and report this data monthly. This must include the following daily parameters: maximum surface injection pressure (pounds per square inch), average surface injection pressure (pounds per square inch), injection volume (barrels per day), and maximum injection rate (barrels per minute). Operators shall report this data on the 15th day of the month following the reporting period. The data will be uploaded to the Bureau of Economic Geology's (BEG) TexNet Injection Volume and Pressure Reporting Tool available at or other system designated by RRC UIC which is available to industry, academia, the public and RRC staff (https://injection.texnet.beg.utexas.edu/).</p> <p>(3) The operator shall submit all pressure data required via two separate methods (formats).</p> <ul style="list-style-type: none"> a. DIRECTLY TO RRC INJECTION-STORAGE PERMITS UNIT. The operator shall submit a report directly to UIC_Permits@rrc.texas.gov (Attn: BHP) under the signature of a Registered Professional Engineer. This report shall contain at a minimum the following information: <ul style="list-style-type: none"> i. UIC number ii. API number iii. Operator name and P-5 number iv. Pressure reading time stamp for vii & ix below v. Depth actual data was gathered (TVD) vi. Injection Formation Name vii. Bottomhole Instantaneous Shut In Pressure (ISIP). viii. Bottomhole fracturing pressure (or gradient) ix. Bottomhole average reservoir pressure.

PERMIT NO. 16380
Page 2 of 5

Note: This document will only be distributed electronically.

		<p>b. TEXNET - The data will be uploaded to the Bureau of Economic Geology's (BEG) TexNet Injection Volume and Pressure Reporting Tool available at or other system designated by RRC UIC which is available to industry, academia, the public and RRC staff (https://injection.texnet.beg.utexas.edu/).</p> <p>INSTRUCTIONS: The following are the allowable methods for obtaining reported bottomhole pressure measurements.</p> <p>(A) Calculated BHP Method: Operator shall pump twice the tubing-volume of a fluid of known density. The well must be shut in for at least four (4) hours, after which the shut-in surface pressure shall be recorded. The BHP shall be calculated by $BHP = \text{surface pressure} + \text{hydrostatic pressure}$ and corrected to a depth indicated by the operator as the shallowest open vertical depth of the completed injection interval. If the well fails to maintain a fluid level to the surface, a fluid level shall be acquired by using reliable downhole tools and technology. The BHP shall then be calculated by the hydrostatic pressure of the liquid column extending from the fluid level depth to a depth indicated by the operator as the shallowest open vertical depth of the completed injection interval.</p> <p>(B) Dip-In BHP Measurement Method: The well must be shut-in for at least four (4) hours before pressure measurement is taken. A BHP measuring device shall be run in the well.</p> <p>(C) Permanent BHP Probe Method: A bottomhole pressure probe may be installed in the well. The reported bottomhole pressures, from a downhole gauge will be corrected for all necessary depth/density adjustments necessary to depth register the pressures to the top of the permitted injection interval.</p> <p>(4) Disposal into the Delaware Mountain Group Formations:</p> <p>(A) The operator shall run, annotate, and provide to the Commission a well log of the well that includes at a minimum, gamma ray, resistivity, porosity, and full-waveform acoustic tracks.</p> <p>(B) The operator shall run and provide to the Commission a cement bond log on all casing strings.</p> <p>(C) The operator shall assess, and quantify using best practices, the fracture closure pressure in the disposal zone, the upper confining strata, and the lower confining strata.</p>
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STANDARD CONDITIONS:

1. Injection must be through tubing set on a packer. The packer must be set no higher than 100 feet above the top of the permitted interval.
2. The District Office must be notified 48 hours prior to:
 - a. running tubing and setting packer;
 - b. beginning any work over or remedial operation;
 - c. conducting any required pressure tests or surveys.

PERMIT NO. 16380
Page 3 of 5

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3. The wellhead must be equipped with a pressure observation valve on the tubing and for each annulus.
4. Prior to beginning injection and subsequently after any work over, an annulus pressure test must be performed. The test pressure must equal the maximum authorized injection pressure or 500 psig, whichever is less, but must be at least 200 psig. The test must be performed and the results submitted in accordance with the instructions of Form H-5.
5. The injection pressure and injection volume must be monitored at least monthly and reported annually on Form H-10 to the Commission's Austin office.
6. Within 30 days after completion, conversion to disposal, or any work over which results in a change in well completion, a new Form W-2 or G-1 must be filed to show the current completion status of the well. The date of the disposal well permit and the permit number must be included on the new Form W-2 or G-1.
7. Written notice of intent to transfer the permit to another operator by filing Form P-4 must be submitted to the Commission at least 15 days prior to the date of the transfer.
8. This permit will expire when the Form W-3, Plugging Record, is filed with the Commission. Furthermore, permits issued for wells to be drilled will expire three (3) years from the date of the permit unless drilling operations have commenced.

Provided further that, should it be determined that such injection fluid is not confined to the approved interval, then the permission given herein is suspended and the disposal operation must be stopped until the fluid migration from such interval is eliminated. Failure to comply with all of the conditions of this permit may result in the operator being referred to enforcement to consider assessment of administrative penalties and/or the cancellation of the permit.

APPROVED AND ISSUED ON December 08, 2025.



for

Reed Baker, Manager
Oil & Gas Injection Permits Unit (OGIP)

PERMIT NO. 16380
Page 4 of 5

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Amendment Comments:

Well No.	API No.	Amendment Comments
5	30134491	1. Amends permit dated 2022/01/05. 2. Amends maximum surface injection pressure for liquid from 1325 psig. 3. Amends maximum daily injection volume for liquid from 40000 bbl/day. 4. Amends listing of permitted injection formation name(s). The previous injection formation name listing was: BELL CANYON{CHERRY CANYON{BRUSHY CANYON.

PERMIT NO. 16380
Page 5 of 5

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