

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

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

CASE NOS. 25547, 25548,
25899 & 25900

DESERT RAM'S NOTICE OF INTERVENTION (NUNC PORO TUNC)

Desert Ram South Ranch, Inc. (“Desert Ram”), by and through undersigned counsel, hereby gives notice of its intervention in the above matters, pursuant to 19.15.4.10 NMAC.

1. Intervenor: Desert Ram South Ranch, Inc.
2. Address / Counsel: [as before]
3. Nature of Interest: Desert Ram is a surface owner and agricultural operator holding legally protected groundwater rights and operating freshwater wells drawing from the aquifer underlying the township in which Select proposes four high-volume saltwater disposal wells. Desert Ram’s water rights and wells are subject to a real, non-speculative risk of injury from pressure propagation and subsurface uncertainty identified in Select’s applications. See *Self-Affirmed Statement of Tim Jurco* for additional discussion of interest.
4. Position: Desert Ram opposes issuance of the requested orders absent appropriate factual development and safeguards.

Desert Ram previously filed an Entry of Appearance and Objection intended to effect intervention under Rule 19.15.4.10. This Notice is filed out of an abundance of caution and does not seek to expand the scope of participation beyond the standing issues presently before the Division.

Respectfully Submitted,

/s/ Matthias Sayer

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CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2026, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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/S/ Matthias Sayer
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SELF-AFFIRMED STATEMENT OF TIM JURCO

1. I am employed by Desert Ram South Ranch, Inc. (Desert Ram) as Manager. I am over the age of eighteen (18), am competent to testify, and have personal knowledge of the matters set forth herein. I submit this Self-Affirmed Statement in support of Desert Ram's Motion for Reconsideration and Renewed Motion for Limited Evidentiary Hearing on Standing before the New Mexico Oil Conservation Division.
2. I am a Manager at Desert Ram and am familiar with Desert Ram's landholdings, agricultural operations, groundwater wells, and water rights in Lea County, New Mexico.
3. Desert Ram owns and leases surface lands used for ranching and agricultural operations within Township 26 South, Range 35 East and Township 26 South, Range 36 East, Lea County, New Mexico. These lands are located within the same township and surrounding area in which Select Water Solutions, LLC proposes four high-volume saltwater disposal wells in Case Nos. 25547, 25548, 25899, and 25900.
4. Desert Ram holds valid New Mexico groundwater rights and permits, including but not limited to:
 - Water Right File Nos. J3, J4, J25/26, J33-L, J34-L
 - Water Right File Nos. CP-465, CP-1170, CP-1263, CP-1351
 - Water Right File Nos. CP-1728, CP-4239, CP-4241

These water rights are actively exercised and are essential to Desert Ram's ongoing agricultural and ranching operations. They constitute legally protected property interests under New Mexico law.

5. Desert Ram owns and operates multiple points of diversion / groundwater wells used to supply water from the above-identified water rights for its ranching and agricultural operations, including wells commonly identified as:

<ul style="list-style-type: none">• J00003• J00003 POD2• J00004 POD 1• J00025 POD 1• J00025 POD 3• J00026 POD 1• J00033 POD 1	<ul style="list-style-type: none">• J00034 POD 1• CP 00465 POD 1• CP 01170 POD 1• CP 01170 POD 2• CP 01170 POD 3• CP 01170 POD 4• CP 01170 POD 5	<ul style="list-style-type: none">• CP 01170 POD 6• CP 01267 POD 1• CP 01263 POD 1• CP 01263 POD 2• CP 01263 POD 3• CP 01263 POD 4• CP 01263 POD 6
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- CP 01263 POD 7
- CP 01263 POD 8
- CP 01351 POD 1
- CP 01351 POD 2
- CP 01728 POD 1
- CP 01728 POD 2
- CP 01728 POD 3
- CP 01728 POD 5

6. Desert Ram's groundwater wells draw from a laterally continuous freshwater aquifer that underlies the township in which Select proposes to locate the four saltwater disposal wells and that necessarily overlies the proposed injection intervals. Desert Ram's operations depend on the continued quality and hydraulic integrity of this aquifer.
7. Based on Select's applications and associated Area of Review materials, Desert Ram's surface lands, groundwater wells, and water rights are located within areas affected by Select's modeled pressure propagation, which Select's own reservoir modeling indicates may extend out to approximately two miles from the proposed wells over the life of injection.
8. If pressure migration, fracture communication, or fluid movement were to occur nearer to the proposed injection wells, impairment within the aquifer would not be confined to the immediate vicinity of the wellbore. Such impairment could propagate through the connected groundwater system supplying Desert Ram's wells through normal groundwater flow and cone-of-depression effects.
9. The potential for impairment of groundwater quality or pressure conditions within the aquifer supplying Desert Ram's wells constitutes a **concrete and non-speculative risk of injury** to Desert Ram's water rights and agricultural operations, irrespective of surface distance from the injection locations.
10. I provide this Self-Affirmed Statement solely to identify Desert Ram's specific surface ownership, groundwater wells, and water rights, and to explain the basis for Desert Ram's standing concerns. Desert Ram does not seek, through this Statement, to litigate the merits of Select's applications, but only to demonstrate that its legally protected interests are plausibly and directly at risk from the proposed injection operations.
11. I declare under penalty of perjury under the laws of the State of New Mexico that the foregoing statements are true and correct to the best of my knowledge.

/s/ Tim Jurco

Tim Jurco

Feb. 5, 2026

Date