

**MARION J. CRAIG III
ATTORNEY AT LAW, L.L.C.**

POST OFFICE BOX 1436
ROSWELL, NM 88202-1436
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**MARION J. "JIMMY" CRAIG III
ATTORNEY AT LAW**

**601 W. SECOND STREET, SUITE 8
ROSWELL, NEW MEXICO 88201**

May 16, 2018

Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, N.M. 87505

Opposition to Applications for Authorization to Inject for the following sites:

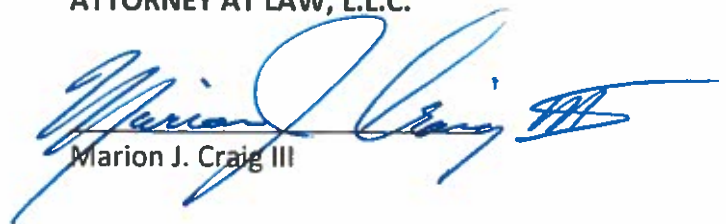
Bear Trap SWD #1
Giant Panda SWD #1
Grizzly SWD #1
Kodiak SWD #1
Hood SWD #1
Zoo SWD #1

Please find enclosed our Oppositions to the above referenced Applications for Salt Water Disposal Wells on behalf of Jim and Barbara Davis. We have enclosed the originals and 1 copies along with a return envelope. Please file the Oppositions and return to our office a filed marked copy.

Thank you for your assistance in this matter.

Sincerely,

**MARION J. CRAIG III
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Marion J. Craig III

Enclosures
xc: Jim and Barbara Davis

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ROSWELL, NEW MEXICO 88201**

May 16, 2018

Sent Via Certified Mail:
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, N.M. 87505

RE: Opposition to Application for Authorization to Inject
Bear Trap SWD#1
Section 3, T-24-S, R-27-E NMPM
Eddy County, NM
Delaware Energy, LLC, Application

Gentlemen:

This letter is written on behalf of Jim Davis and Barbara Davis as their Objection to the above-referenced Application for a salt-water disposal well.

The Davis' property is located in Section 8, T-24-S, R-27-E.

Mr. and Mrs. Davis own water rights and mineral rights at the above-referenced location, which is located along Black River.

The opposed salt water disposal well is in proximity to both the Protestants' dwelling, their water wells and Black River (which would include an endangered species habitat).

This salt water disposal well is also objected to on each of the following reasons:

A. The proposed well is within one mile of Black River. The Black River area is extremely porous, and any loss of fluid in the disposal well will immediately find its way to the River, which has been deemed a critical habitat for the Texas Hornshell Mollusk;

B. The distance from any house should be at least 1,000 feet since all of these houses have domestic wells, and any leakage will directly find its way into those wells;

C. These applications fail to address the issue of approvable access from the available roads;

D. In the event that pipelines are required to cross Black River to any of the disposal well, boring under the River is unacceptable as the water table alone is only within the first 25 to

30 feet, with a second zone between 50 and 60 feet. Any leakage will automatically contaminate the River killing at least one endangered species, and a species which is being studied as being potentially endangered.

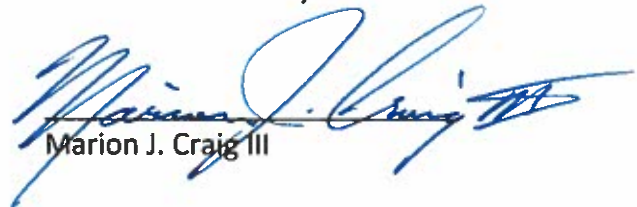
E. This salt water disposal well will pass through the ground water which flows directly into Section 8 and Black River, and additionally will pass through or be drilled through a zone which flows through the opponents' domestic well used for the Protestant's home.

Due to the sensitive nature of the area in which the salt water disposal wells are proposed, being a critical habitat, and Black River being a high porosity area, the salt water disposal wells proposed would pose a serious threat to the eco system and Black River. Black River also flows into the Pecos River, which is subject to the Texas – New Mexico Compact.

Jim and Barbara Davis request that this Application be denied.

Sincerely,

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May 16, 2018

Sent Via Certified Mail:
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, N.M. 87505

RE: Opposition Application for Authorization to Inject
Giant Panda SWD#1
Section 9, T-24-S, R-27-E
Eddy County, New Mexico
Delaware Energy, LLC Application

Gentlemen:

This letter is written on behalf of Jim Davis and Barbara Davis as their Objection to the above-referenced Application for a salt-water disposal well.

The Davis' property is located in Section 8, T-24-S, R-27-E.

Mr. and Mrs. Davis own water rights and mineral rights at the above-referenced location, which is located along Black River.

The opposed salt water disposal well is in proximity to both the Protestants' dwelling, their water wells and Black River (which would include an endangered species habitat).

This salt water disposal well is also objected to on each of the following reasons:

A. The proposed well is within one mile of Black River. The Black River area is extremely porous, and any loss of fluid in the disposal well will immediately find its way to the River, which has been deemed a critical habitat for the Texas Hornshell Mollusk;

B. The distance from any house should be at least 1,000 feet since all of these houses have domestic wells, and any leakage will directly find its way into those wells;

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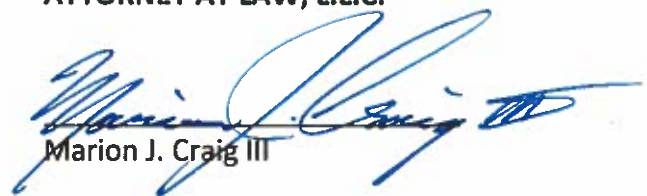
E. This salt water disposal well will pass through the ground water which flows directly into Section 8 and Black River, and additionally will pass through or be drilled through a zone which flows through the opponents' domestic well used for the Protestant's home.

Due to the sensitive nature of the area in which the salt water disposal wells are proposed, being a critical habitat, and Black River being a high porosity area, the salt water disposal wells proposed would pose a serious threat to the eco system and Black River. Black River also flows into the Pecos River, which is subject to the Texas – New Mexico Compact.

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Sent Via Certified Mail:
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1220 South St. Francis Drive
Santa Fe, N.M. 87505

RE: Opposition to Application for Authorization to Inject
Grizzly SWD #1
Section 11, T-24-S, R-27-E NMPM
Eddy County, NM

Gentlemen:

This letter is written on behalf of Jim Davis and Barbara Davis as their Objection to the above-referenced Application for a salt-water disposal well.

The Davis' property is located in Section 8, T-24-S, R-27-E.

Mr. and Mrs. Davis own water rights and mineral rights at the above-referenced location, which is located along Black River.

The opposed salt water disposal well is in proximity to both the Protestants' dwelling, their water wells and Black River (which would include an endangered species habitat).

This salt water disposal well is also objected to on each of the following reasons:

A. The proposed well is within one mile of Black River. The Black River area is extremely porous, and any loss of fluid in the disposal well will immediately find its way to the River, which has been deemed a critical habitat for the Texas Hornshell Mollusk;

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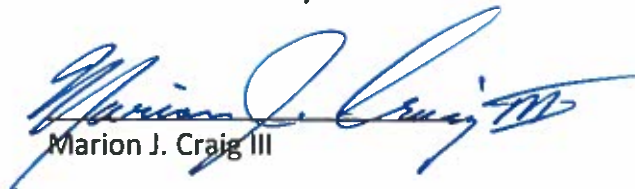
E. This salt water disposal well will pass through the ground water which flows directly into Section 8 and Black River, and additionally will pass through or be drilled through a zone which flows through the opponents' domestic well used for the Protestant's home.

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1220 South St. Francis Drive
Santa Fe, N.M. 87505

RE: Opposition to Application for Authorization to Inject
Kodiak SWD #1
Section 5, T-24-S, R-27-E NMPM
Eddy County, NM

Gentlemen:

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Mr. and Mrs. Davis own water rights and mineral rights at the above-referenced location, which is located along Black River.

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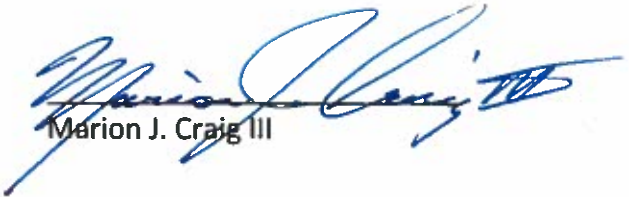
E. This salt water disposal well will pass through the ground water which flows directly into Section 8 and Black River, and additionally will pass through or be drilled through a zone which flows through the opponents' domestic well used for the Protestant's home.

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