



**MONTGOMERY
& ANDREWS**
LAW FIRM

SETH C. McMILLAN
Phone: (505) 986-2519
Email: smcmillan@montand.com
www.montand.com

September 28, 2018
VIA EMAIL

Mr. Phillip Goetze
Oil Conservation Division
New Mexico Department of Energy,
Minerals, and Natural Resources
1220 South St. Francis Drive
Santa Fe, NM 87505

**Re: Foundation Minerals, LLC and Mavros Minerals, LLC Protest of Delaware Energy,
LLC SWD Applications**

Dear Mr. Goetze:

Foundation Minerals, LLC and Mavros Minerals, LLC ("Protestants") hereby protest the following SWD applications recently advertised by Delaware Energy, LLC. Protestants' future development of the following described mineral interests may be impacted by these disposal wells:

Bugs Bunny SWD#1, Section 36, T24S, R27E

- Protestants own nearby minerals in Sec. 24, 24S-27E and Sec. 18, 19, 21 & 28, 24S-28E

Road Runner SWD#1, Section 24, T24S, R27E

- Protestants own minerals in this section, along with offset minerals in Sec. 18 & 19, 24S-28E and Sec. 3, 4, 8, 9, 10 & 11, T24-27E to the northwest

Kodiak SWD #1, Section 5, T24S, R27E (re-advertised with new surface location)

- Protestants own offset minerals in Sec. 3, 4, 8, 9, 10 & 11

Grizzly SWD#1, Section 11, T24S, R27E (re-advertised with new surface location)

- Protestants own minerals in this section, along with Sec. 3, 4, 8, 9, & 10

Sincerely,

/s/ Seth C. McMillan

cc: Brian Arnold, Jr.

Goetze, Phillip, EMNRD

From: Seth McMillan <SMcMillan@montand.com>
Sent: Friday, September 28, 2018 5:01 PM
To: Goetze, Phillip, EMNRD
Cc: 'Brian Arnold'; David Ortiz
Subject: [EXT] Foundation Minerals, LLC and Mavros Minerals, LLC Protest of Delaware SWD Applications
Attachments: 20180928 Letter from Seth C. McMillan.pdf

Mr. Goetze,

Please see the attached letter re: Foundation Minerals, LLC and Mavros Minerals, LLC's protest of certain Delaware Energy SWD applications recently advertised in the Carlsbad newspaper. Please let me know if you have any questions.

Thanks,
Seth



Seth C. McMillan
Attorney at Law
Montgomery & Andrews, P.A.
325 Paseo de Peralta
Santa Fe, NM 87501
P. O. Box 2307
Santa Fe, NM 87504-2307
T: (505) 986-2519
F: (505) 982-4289
smcmillan@montand.com

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