



**MONTGOMERY
& ANDREWS**
LAW FIRM

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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
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October 16, 2018

Heather Riley, Director
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87501

HAND-DELIVERED

**RE: Application for Administrative Approval of Salt Water Disposal Well:
Delaware Energy, LLC
Kodiak SWD #1
Section 5, Township 24 South, Range 28 East, NMPM
Eddy County, New Mexico
PMAM1813650931**

Dear Ms. Riley:

This firm represents NGL Water Solutions Permian, LLC ("NGL"). NGL is the operator of the Striker 3 SWD Well No. 1 (SWD-1690) located in unit P of Section 33, Township 23 South, Range 28 East, approximately 1.3 miles± from the proposed Kodiak SWD No. 1. NGL is currently conducting injection operations through its Striker 3 SWD Well No. 1 into the Devonian and Silurian formations through its Striker 3 SWD Well No. 1 at approximately the same stratigraphic equivalent as that proposed to be used by Delaware Energy, LLC.

Please be advised that pursuant to Division Rule 19.15.26.8.D, NGL objects to Delaware Energy, LLC's application. In view of the close proximity of the existing and proposed injection wells, the Director should find that a hearing on the Delaware Energy application is deemed advisable.

Very truly yours,

Sharon T. Shaheen

Kaleb W. Brooks

Attorneys for NGL Water Solutions Permian, LLC

cc (via email): Joe Vargo, NGL Water Solutions Permian, LLC

REPLY TO:

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