

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

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**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

**APPLICATION OF GUARDIAN OPERATING
CORPORATION FOR AUTHORIZATION TO
INJECT, EDDY COUNTY, NEW MEXICO.**

Case No. 15,483

NOTICE OF INTERVENTION

This Notice of Intervention is submitted by Mewbourne Oil Company ("Mewbourne") as required by the regulations of the Oil Conservation Division.

INTERVENOR'S NAME

Mewbourne Oil Company
c/o James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
Phone: (505) 982-2043
Fax: (505) 982-2151
jamesbruc@aol.com

Attorney for Mewbourne Oil Company

NATURE OF INTERVENOR'S INTEREST

Applicant seeks authorization to inject into the Cherry Canyon member of the Delaware Mountain Group in the Kirkes SWD Well No. 1, located in Unit J of Section 10 of Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico. The well's location is identified on the Midland Map Co. plat marked as Exhibit A, attached hereto.

Mewbourne's acreage is highlighted in yellow on Exhibit A. While Mewbourne's acreage is outside the one-half mile area of review, it owns substantial leasehold very near to the proposed SWD well.

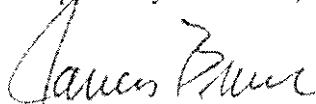
BASIS OF INTERVENOR'S OPPOSITION

Mewbourne opposes the application because of the following issues:

1. There are numerous examples of producing wells being adversely affected by injection wells located miles away from the producing wells.
2. There is a Cherry Canyon producer in Unit K of Section 2, Township 24 South, Range 28 East, NMPM, with cumulative production of 15 MBO. Therefore, the Cherry Canyon zone is proven to be productive within 1 mile of the proposed SWD well.
3. The Delaware Mountain Group has anomalously low frac gradients, and there are no frac barriers or impermeable strata to prevent migration of injection fluids outside of the proposed injection interval.
4. If approved, the proposed SWD well could adversely affect both the Brushy Canyon zone and the Avalon zone of the Bone Spring formation.

The wellbore configuration is ideal for sidetracking and deepening to the Devonian formation. The Devonian formation in the area has been proven to be an excellent disposal reservoir which is barren of hydrocarbons. Injection into the Devonian formation would prevent potential waste of proven productive reserves and allow for more disposal capacity.

Respectfully submitted,



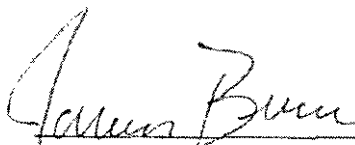
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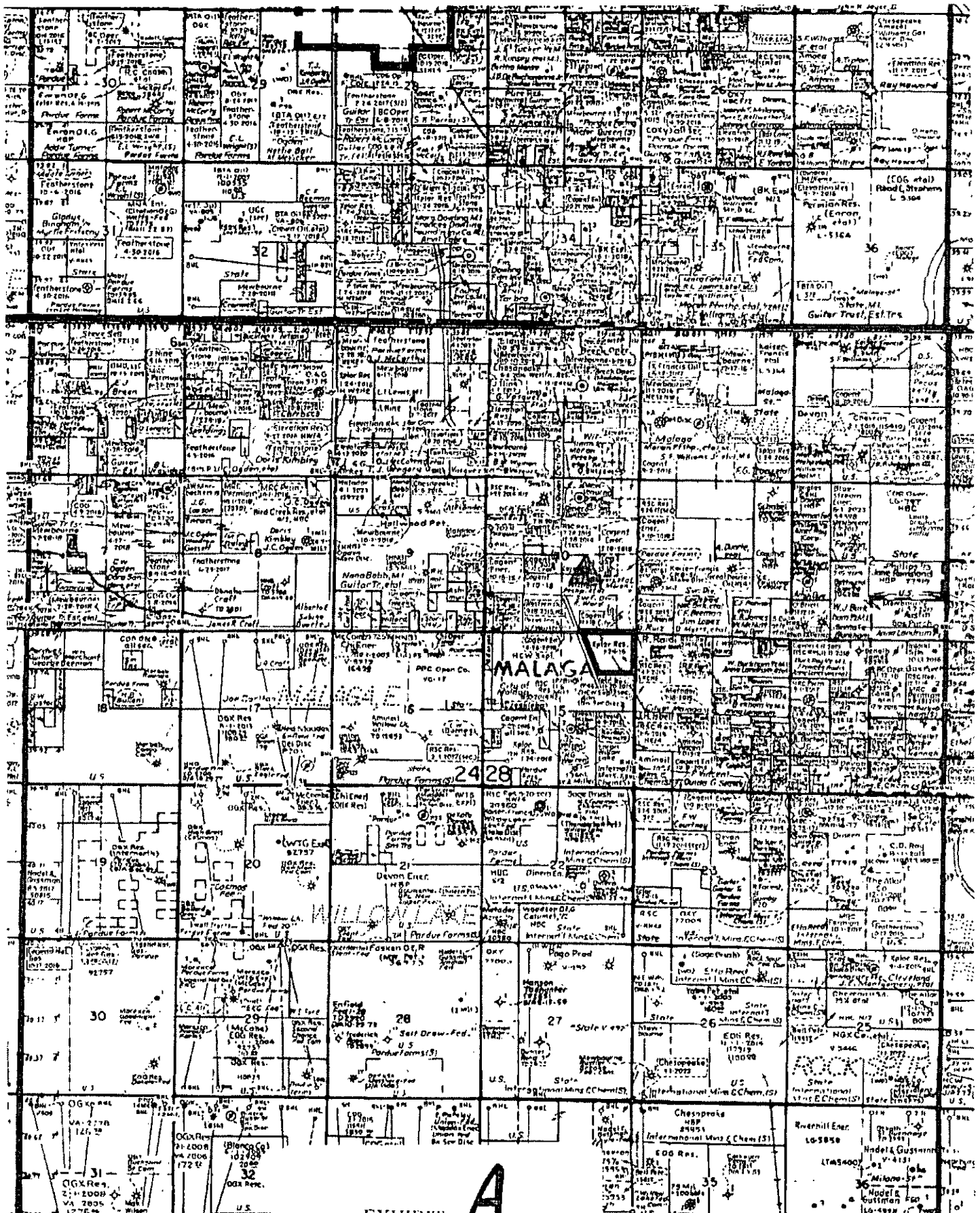
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 15th day of April, 2016 by e-mail:

J. Scott Hall
shall@montand.com



James Bruce



EXHIBIT

A