

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:

OWL SWD OPERATING, LLC APPLICATION FOR
AUTHORIZATION TO INJECT

Case No. 15753

**MOTION TO INTERVENE AND TO CONSOLIDATE
CASE NOS. 15723 AND 15753**

The New Mexico State Land Office ("SLO") through its attorney, Katherine M. Moss, moves to intervene in Case No. 15753 pursuant to NMAC 19.15.4.10, on the basis that it owns the mineral estate approximately seven hundred (700) feet from the injection site of the Maralo Sholes B Well No. 2 which was drilled into Tansill, Yates-Seven-Rivers zones just above the Capitan Reef in an area which contains protectable groundwater of the State of New Mexico.

The SLO further moves to consolidate Cases Nos. 15723 and 15753. The SLO is a party in Case No. 15723 which, as the Division knows, concerns a replacement well for the Maralo Sholes B Well No. 2. The legal issues in the two cases are the same, the facts are nearly identical and, for the SLO, the evidence and the witnesses are the same.

WHEREFORE, the SLO respectfully moves that the hearing officer allow the SLO to intervene in Case No 15753 and to consolidate Case Nos. 15723 and 15753.

Respectfully Submitted,

Katherine M. Moss

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CERTIFICATE OF SERVICE

I hereby certify, that on this 28th day of June, 2017, a copy of the foregoing pleading was served via email upon the following counsel of record:

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