

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

APPLICATION OF DELAWARE ENERGY LLC TO REVOKE THE INJECTION
AUTHORITY GRANTED UNDER SWD-1680 FOR THE ALPHA SWD NO. 1 WELL
OPERATED BY ALPHA SWD OPERATING LLC, EDDY COUNTY, NEW MEXICO.

Case No. 15855 (*de novo*)
Order No. R-14484-A

ALPHA SWD OPERATING, LLC'S
RESPONSE IN OPPOSITION TO DELAWARE ENERGY LLC'S
MOTION FOR JUDGMENT BASED ON THE DIVISION RECORD

Applicant Alpha SWD Operating, LLC ("Alpha SWD") submits its response in opposition to Delaware Energy LLC's ("Delaware's") Motion for Judgment Based on the Division Record ("Motion") and Supplement to Motion for Judgment Based on the Division Record ("Supplement"). In support of its response, Alpha SWD states:

1. On June 12, 2017, Alpha SWD filed an administrative application requesting authorization to inject produced water into an SWD well. There were no objections to the application submitted to the Oil Conservation Division ("Division"). On June 28, 2017, the Division issued Administrative Order SWD-1680 ("SWD-1680") granting the requested authorization to inject.

2. Three months later, Delaware filed an application seeking the revocation of SWD-1680. Premised on the claim that its October 2016 application for authorization to inject into a nearby SWD well remained pending when Alpha SWD submitted its application in June 2017, Delaware's application asserts that: (1) Alpha SWD knew that Delaware had a pending application and failed to notify Delaware of its application; (2) the Division should have required Alpha SWD

to provide notice to Delaware; and (3) the Division violated 19.15.26.8 (C)(2) NMAC in issuing SWD-1680. *See Delaware Application*, attached hereto as Exhibit A, at 1-3. On February 13, 2018, the Division issued Order No. R-14484-A rescinding SWD-1680.

3. Alpha SWD then timely filed an application for a *de novo* hearing. As a party adversely affected by Order No. R-14484-A, Alpha SWD has a statutory right to an evidentiary hearing before the Oil Conservation Commission (“Commission”) on all of the assertions in Delaware’s application. NMSA §70-2-13 (a party adversely affected by a Division order “*shall have the right to have the matter heard de novo before the commission*”) (emphasis added); *accord* 19.15.4.23(A) NMAC (if a party adversely affected by a Division order timely files an application for a hearing *de novo*, “the commission chairman *shall set the matter or proceeding for hearing before the commission*) (emphasis added).

4. Without citation to any provision of the Oil and Gas Act or any Commission rule, Delaware is attempting a preemptive strike on Alpha SWD’s right to a *de novo* hearing conducted by the Commission. Delaware’s effort fundamentally misapprehends the nature and scope of a *de novo* appeal.

5. In this *de novo* appeal, the Commission’s mandate is to consider all of the assertions in Delaware’s application *anew* as if no decision previously had been reached. The Commission must independently consider all of the assertions in Delaware’s application, and is not bound or controlled, or otherwise influenced by, the Division’s action. *See Clayton v. Farmington City Council*, 1995-NMCA-079, ¶16, 120 N.M. 448; *Black’s Law Dictionary* at 447 (7th ed.) (*de novo* means “anew”); *see also Southern Union Gas Co. v. Taylor*, 1971-NMSC-067, ¶6, 82 N.M.670. The Commission’s role does not include essentially adopting the Division’s reasoning, based on a truncated evidentiary record, as Delaware would have the Commission do.

6. Delaware's motion contends that Order No. R-14484-A rescinds SWD-1680 "solely on the legal basis" that the Division failed to comply with 19.15.26.8(C) NMAC. *Motion* at 1. The basis of the Division's ruling in Order No. R-14484-A, however it is characterized by Delaware, is of no consequence. The Commission is required to render its own independent decision, regardless of what the Division did or did not do, after an evidentiary hearing. *Clayton*, 1995-NMCA-079, ¶ 16.

7. As noted above, this case involves other legal and factual issues in addition to an interpretation and application of 19.15.26.8(C) NMAC. Alpha SWD does not dispute the authenticity of the Division documents attached as exhibits to Delaware's Supplement. But Alpha SWD does dispute that the Commission has the authority, which Delaware mistakenly suggests that it has, to preemptively terminate a *de novo* appeal by entering a "judgment" based on action taken by the Division and a truncated set of exhibits.

8. Delaware's Motion impliedly acknowledges the broader range of issues presented in this case in asserting that Alpha SWD's application for injection authority was administratively approved "without notice to Delaware" and "without consideration of Delaware's pre-filed application." *Motion* at 1. The issues of whether Delaware was entitled to receive notice of Alpha SWD's application, and whether Delaware had an application pending when Alpha SWD filed its application, are disputed by Alpha SWD and must be resolved by the Commission.

9. The Division records attached to Delaware's Supplement only tell part of the story. Other Division records cast doubt on the assertions in Delaware's application. An April 19, 2017 Division listing of pending and unapproved administrative applications indicates that the application for injection authority filed by Delaware on October 24, 2016 had been cancelled.

April 19, 2017 list of Administrative Applications Not Approved, attached hereto as Exhibit B.¹ A Division listing dated October 20, 2017 similarly indicates that Alpha SWD's October 26, 2016 application had been cancelled, and further indicates that a Delaware application addressing the same SWD well was filed on July 3, 2007 and assigned a new application number by the Division. *October 20, 2017 list of Administrative Applications Not Approved*, attached hereto as Exhibit C.²

10. As the Division records appear to indicate, Delaware's second application was filed *after* the Division had issued SWD-1680. If Delaware did not have an application pending at the time Alpha SWD filed its application, and was not otherwise entitled to receive notice of Alpha SWD's application, then the question arises whether Delaware has standing to request the revocation of SWD-1680.

11. In considering Delaware's application anew, as it is mandated to do by the Oil and Gas Act and its rules, the Commission must conduct an evidentiary hearing on all of the assertions in Delaware's application, in addition to determining whether Delaware has standing to request the revocation of SWD-1680. Consequently, Alpha SWD submits that Delaware's Motion should be denied.

WHEREFORE, Alpha SWD requests that the Commission deny Delaware's Motion and set this matter for hearing.

¹ In the interest of saving paper, Alpha SWD has included only the pertinent pages of the April 19, 2017 list.

² Exhibit 3 similarly includes only the pertinent pages of the Division's October 20, 2017 list.

Respectfully submitted,

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Counsel for Alpha SWD Operating LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of May, 2018 I served a true and correct copy of the foregoing Applicant Alpha SWD Operating, LLC's Response in Opposition to Delaware Energy LLC's Motion for Judgment Based on the Division Record via email to:

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Counsel for Delaware Energy LLC



Gary W. Larson

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

**APPLICATION OF DELAWARE ENERGY LLC TO REVOKE THE INJECTION
AUTHORITY GRANTED UNDER SWD-1680 FOR THE ALPHA SWD NO. 1 WELL
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Case No. 13-38

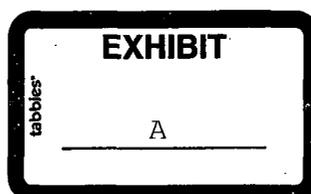
APPLICATION

Delaware Energy LLC (“Delaware Energy”) respectfully applies for an order revoking the injection authority granted under Administrative Order SWD-1680. In conjunction with this application, and filed contemporaneously herewith, Delaware Energy also moves the Oil Conservation Division (“Division”) to stay the effectiveness of SWD-1680 pending the Division’s ruling on this application. In support, Delaware Energy states as follows:

1. On or about October 6, 2016, Delaware Energy LLC (OGRID No. 371195) filed a C-108 application for administrative approval for authorization to inject for a proposed salt water disposal well. The proposed well, the Ruiz SWD No. 1, is to be located 2,565 feet from the south line and 2,360 feet from the west line of Section 10, Township 24 South, Range 28 East, Eddy County, New Mexico. The proposed injection interval is in the Devonian from a depth of 13,650 feet to 14,650 feet.

2. While Delaware Energy’s application was pending before the Division, the Division received two protests of Delaware Energy’s C-108 application from Guardian Operating Corporation and RSC Resources, L.P. The Division notified Delaware Energy of the protests by e-mail on October 31, 2016. *See Exhibit A*, attached hereto.

3. Delaware Energy subsequently engaged Guardian Operating Corporation and RSC Resources, L.P. in discussions to address their objections. After substantial negotiations and technical consultation, Delaware Energy agreed to revise its casing program. Guardian Operating



Corporation and RSC Resources, L.P. notified the Division on June 27, 2017 that Delaware Energy's revised casing program resolved their objections and formally withdrew their protests. *See Exhibit A.* The Division resumed administrative review of Delaware Energy's C-108 application.

4. In the interim, and unbeknownst to Delaware Energy, Alpha SWD Operating LLC ("Alpha") (OGRID 372180), filed a C-108 application for authorization to inject for a competing proposed salt water disposal well on June 12, 2017. *See Exhibit B*, attached hereto. The proposed well, the Alpha SWD No. 1, is to be located 1,457 feet from the south line and 2,093 feet from the east line of Section 10, Township 24 South, Range 28 East, Eddy County, New Mexico. The location of the proposed Alpha SWD No. 1 well is approximately 800 feet from the proposed location of Delaware Energy's earlier-filed C-108 application. The proposed injection interval also is within the Devonian from a depth of 14,000 feet to 15,200 feet.

5. On information and belief, Alpha knew, as of the date it filed its June application, that Delaware Energy had a pending C-108 application before the Division for an injection well in the same area and same injection formation. Notwithstanding this knowledge, Alpha failed to provide notice of its C-108 application to Delaware Energy.

6. Upon receipt of Alpha's C-108 application, the Division determined on June 12, 2017, that it was administratively incomplete and "will not be placed into the administrative review process." *See Exhibit B*, at 25. As filed, Alpha's application was missing information that is required before it could be considered "complete with all attachments[.]" *See* 19.15.26.8.C(2) NMAC. Alpha submitted the additional requested information to the Division on June 19, 2017. *See Exhibit B*, at 26-29, 30 (reflecting that additional information was received on 6/19/17). Again, no notice of this additional filing was provided to Delaware Energy despite the fact that it had a previously filed administrative application pending before the Division.

7. On June 28, 2017, nine days after receiving the additional necessary information, and less than the required fifteen days “following the division’s receipt of form C-108 complete with all attachments[,]” the Division approved Alpha’s C-108 application and issued Administrative Order SWD-1680. *See* Administrative Order SWD-1680, attached as Exhibit C.

8. The failure to provide notice to Delaware Energy of Alpha’s competing C-108 application, and the Division’s approval of SWD-1680 sooner than the fifteen days mandated by 19.15.26.8.C(2) NMAC deprived Delaware Energy of the opportunity to protest Alpha’s application. Administrative Order SWD-1680 states that “no protest was received within the required suspense period,” but SWD-1680 was approved before the required fifteen days had run. *See* Exhibit C.

9. The Division’s approval of SWD-1680 on June 28, 2017, violated Delaware’s due process rights and the provisions of 19.15.26.8.C(2) NMAC.

10. Prior to considering Alpha’s competing C-108 application, the Division should have required Alpha to provide notice to Delaware Energy or notified Delaware Energy itself of Alpha’s pending application. The Division should not have approved Administrative Order SWD-1680 without first affording Delaware Energy an opportunity to protest Alpha’s later-filed C-108 application. The purpose and intent of the Division’s notice requirements is to give notice of a proposed injection well to affected persons with a known interest in the half-mile area of review. *See* 19.15.26.7.A NMAC and 19.15.26.8.B(2) NMAC.

11. Upon receiving Division approval under SWD-1680, Alpha contacted Delaware Energy to inquire whether Delaware Energy would be willing to purchase Alpha’s approved SWD-1680. When Delaware Energy declined Alpha’s offer, Alpha filed a protest against Delaware Energy’s C-108 application on July 13, 2017. *See* Exhibit D, attached hereto.

12. Revocation of SWD-1680 is necessary to remedy substantial prejudice to Delaware Energy, which has been deprived of the due process afforded to it by the Division's rules and the opportunity to protest Alpha's C-108 application. For the same reasons, as demonstrated in Delaware Energy's accompanying motion, Alpha's authority to inject under SWD-1680 should be stayed pending the Division's ruling on this application.

13. In the alternative, if Alpha's Administrative Order SWD-1680 is not revoked, authority to inject under SWD-1680 should be modified to require commencement of injection operations into the subject well within a one-year period. Alpha's offer to sell its SWD permit to Delaware almost immediately after it was improperly approved demonstrates not only Alpha's knowledge of Delaware's previously filed C-108 application, but also an intent to monetize its improperly obtained permit rather than to drill the well and commence injection. Moreover, pursuant to 19.15.26.12.C(1) NMAC the Division's policy has been to require commencement of injection operations within a year unless good cause is shown for extending that time frame.

14. Rule 19.15.26.12.C(1) NMAC provides that the Division "shall consider" salt water disposal project "abandoned, and the authority for injection shall automatically terminate *ipso facto*" after a "one year period of non-injection[.]" (emphasis added). The only exception to this mandate is that the director may grant an administrative extension, but only "[f]or good cause shown." 19.15.26.12.C(1) NMAC.

15. SWD-1680 gives Alpha two years after the effective date of the Order to commence injection activities. *See* SWD-1680 at 3. Alpha's C-108 application does not request authority for a two-year period before commencing injection, nor does it provide "good cause" for a two-year period to commence injection. *See* 19.15.26.12.C(2) (requiring a showing of good cause for any extension of the one-year period to commence injection.)

WHEREFORE, Delaware Energy requests that the Division set this matter for hearing before an examiner of the Oil Conservation Division on October 12, 2017, and that after notice and hearing enter an order revoking Alpha's injection authority approved under SWD-1680 for the Alpha SWD No. 1 well or, in the alternative, modifying SWD-1680 to require commencement of injection operations within a one-year period, and that the Division grant such further relief as the Division deems appropriate.

Respectfully submitted,

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ATTORNEYS FOR DELAWARE ENERGY LLC

Administrative Applications Not Approved
(see OCD Online for approved permits)

Pending = waiting on OCD review or end of notice suspense period.
Suspended = waiting on factors outside the OCD. see comments.
Canceled = timed out, denied or withdrawn, see comments.

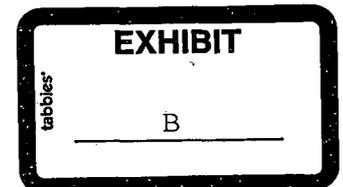
APPLICATION TYPES
CTB, PLC, PC = Surface Commingling
OLM = Off Lease Measurement
NSL = Non Standard Location
SD = Simultaneous Dedication
NSP = Non Standard Proration Unit
SWD = Salt Water Disposal
IPI = Injection Pressure Increase
WFX, PMX = Waterflood/Pressure Maintenance Expansion

Wednesday, April 19, 2017 9:16:14 AM

All Pending Applications and
All Suspended/Canceled within past 180 days
Sorted by Received Date

County	Engr	App	Received	Days	Permit/Application	Resolved	Status	Applicant	Contct	First_API	All Comments
Eddy	MAM	SWD	4/17/2017	0	pMAM1710746033	4/17/2017	Susp	ROCKCLIFF OPERATING NFW M	Brian Wood; Agent	30-015-23339	Protested Chevron
Lea	MAM	SWD	4/17/2017	2	pMAM1710757523		Pend	RAZ OIL AND GAS L.L.C.	Danny Holcomb; Agent	30-025-38162	
Eddy	MAM	SWD	4/17/2017	0	pMAM1710744638	4/17/2017	Susp	ROCKCLIFF OPERATING NFW M	Brian Wood; Agent	30-015-22931	Protested Chevron USA
Lea	MAM	WFX	4/17/2017	2	pMAM1710847578		Pend	APACHE CORP	Brian Wood; Agent	30-025-06643	
Eddy	MAM	DHC	4/17/2017	2	pMAM1710830639		Pend	CIMAREX ENERGY CO. OF CO	Amithy Crawford; Regulator	30-015-34199	
Eddy	MAM	SWD	4/17/2017	0	pMAM1710749639	4/17/2017	Canc	TACTICAL OIL & GAS, LLC	Brian Wood; Agent	30-015-25003	
Eddy	LEL	NSP	4/14/2017	5	pKSC1710737187		Pend	OXY USA INC	David Stewart david_stew	30-015-44074	Pending 20 day period Well Cedar Canyon 23 Federal Com #33H; API 30-015-44074
	LEL	NSL	4/10/2017	9	pKSC1710158072		Pend	COG OPERATING LLC	Debora L. Wilbourn dwill	30-025-43299	Pending 20 day period Well Skull Cap Federal Com #22H; API # 30-025-43299
Lea	PRG	SWD	4/10/2017	9	pMAM1710058162		Pend	BTA OIL PRODUCERS, LLC	Kayla McConnell; Regulator	30-025-26692	
Lea	MAM	SWD	4/6/2017	13	pMAM1709735973		Pend	STEARNS	Danny Holcomb; Agent	30-025-23833	
Lea	LEL	NSL	4/6/2017	13	pKSC1709730771		Pend	DEVON ENERGY PRODUCTION C	Carol Glass (405) 522-6	30-025-43012	Pending 20 day period Well Blue Krait 23-14 Fed #5H; API 30-025-43012
Lea	LEL	NSL	4/6/2017	13	pKSC1709731879		Pend	DEVON ENERGY PRODUCTION C	Justin Porter Justin.Po	30-025-43237	Pending 20 day period Well Blue Krait 23 Fed #3H; API 30-025-43237
Eddy	LEL	NSL	4/5/2017	14	pKSC1709558173		Pend	CIMAREX ENERGY CO. OF CO	Jennifer L. Bradfute (E-m	30-015-39891	To Process as timely allowed, 04.05.17 Irwin 23-14 Federal #1; API 30-015-39891

MAM = Michael McMillan, PRG = Philip Goetze, LEL = Leonard Lowe, WVJ = Will Jones



County	Engr	App	Received	Days	Permit/Application	Resolved	Status	Applicant	Contct	First_API	All Comments
Eddy	MAM	SWD	1/9/2017	22	pMAM1701032155	1/31/2017	Canc	DELAWARE ENERGY, LLC	Preston Stein; Vice-Presi	pMAM1701032155	Lot 2 Sec. 32 T265 R29E; Catfish SWD#1; 30-015-pending. Cancelled by applicant May resubmit application in the future
Lea	PRG	SWD	12/12/2016	128	pMAM1634939548		Pend	TARGA MIDSTREAM SERVICES	Alberto Gutierrez, Agent	pMAM1634939548	Targa Monument AGI#3;30-025-pending; Sec.36 T19 R36E; Pool AGI;Devonian
Eddy	LEL	NSL	11/18/2016	0	pSD1631548268	11/18/2016	Canc	OXY USA INC	David Stewart - Oxy	pSD1631548268	Corral Fly 35-26 Federal Com No. 22H
Eddy	MAM	NSL	11/18/2016	30	pMAM1632343064	12/18/2016	Susp	MEWBOURNE OIL CO	Jim Bruce; Attorney	30-015-41309	See hearing docket Yardbirds 34 W2NC Fee Well No. 1H 30-015-41309
Eddy	MAM	NSL	11/18/2016	30	pMAM1632336511	12/18/2016	Canc	MEWBOURNE OIL CO	Jim Bruce; Attorney	30-015-43464	See R-14240 and NSL-7435 Timed out, See Hearing Docket 30-015-43464 Yardbirds 34 W2OB Fee #1H
Eddy	MAM	NSL	11/16/2016	16	pMAM1632157462	12/2/2016	Canc	CAZA OPERATING, LLC	Scott Hall; Attorney	30-015-43898	No NSL required because within 50' of projected path
Eddy	MAM	SWD	11/7/2016	21	pMAM1631260141	11/28/2016	Canc	RAY WESTALL OPERATING, IN	Ben Stone; Agent	30-015-22601	Applicant agreed to submit revised SWD application
Eddy	PRG	SWD	10/31/2016	3	pPRG1630829712	11/3/2016	Canc	DELAWARE ENERGY, LLC		pPRG1630829712	Enciso Fed. SWD #1; D-35-215-27E; 1095 FNL/2090 FEL Protested by Finley; application not complete.
San Juan	PRG	PMX	10/24/2016	0	pMAM1630556943	10/24/2016	Susp	ROBERT L BAYLESS	John Thomas; Production a	30-045-35300	Proposed Casing Head Gas Reinjection - no way to gather gas Also see pending hearing Case 15622 for this Unit and Gas Injection
Eddy	PRG	SWD	10/24/2016	2	pMAM1630053276	10/26/2016	Canc	DELAWARE ENERGY, LLC	Preston Stein; Vice Presi	pMAM1630053276	Rui2SWD#1;suspended/; no Aff.pub;no return receipt;no wellbore diagram
Eddy	LEL	NSP	10/14/2016	31	pKSC1629257169	11/14/2016	Susp	CIMAREX ENERGY CO. OF COL	Jennifer L. Bradfute (505)	30-015-43847	Application in review... suspended based on time WELL: Crescent Hale 10 Federal Com 4H; API # 30-015-43847
Eddy	MAM	SWD	10/3/2016	37	pMAM1627852869	11/9/2016	Canc	SOLARIS WATER MIDSTREAM,	Brian Wood; Agent	30-015-42813	Original Operator cancelled existing permit. New applicant must submit new application
Lea	MAM	CTB	9/30/2016	27	pMAM1627451309	10/27/2016	Canc	MATADOR PRODUCTION COMPAN	Sherri Gore; Regulatory t	30-025-42352	Cancelled; Operator resubmitted application with preliminary correct notice
Lea	PRG	SWD	9/26/2016	32	pMAM1627054773	10/28/2016	Canc	STEARNS	Danny Holcomb; agent	30-025-34070	Application cancelled; Improper notice
Lea	PRG	SWD	9/15/2016	216	pMAM1626333518		Pend	LYNX PETROLEUM CONSULTANT	Larry R. Scott; President	30-025-37943	

Administrative Applications Not Approved
(see OCD Online for approved permits)

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Suspended = waiting on factors outside the OCD, see comments.
Canceled = timed out, denied or withdrawn, see comments.

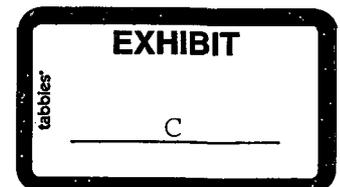
APPLICATION TYPES
CTB, PLC, PC = Surface Commingling
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NSP = Non Standard Proration Unit
SWD = Salt Water Disposal
IPI = Injection Pressure Increase
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Friday, October 20, 2017 3:42:58 PM

All Pending Applications and
All Suspended/Canceled within past 180 days
Sorted by App Type then Received Date

County	Engr	App	Received	Days	Permit/Application	Resolved	Status	Applicant	Contct	First_API	All Comments
Lea	MAM	CTB	10/12/2017	0	pMAM1728547562	10/12/2017	Canc	COG OPERATING LLC	Kanicia Castillo; Lead Re	30-025-41490	Applicant requested metering and well testing for compulsory pooled wells
Eddy	MAM	CTB	10/10/2017	10	pMAM1728351279		Pend	COG OPERATING LLC	Amanda Avery; Regulatory	30-015-41423	
Eddy	MAM	CTB	10/6/2017	14	pMAM1727952765		Pend	CIMAREX ENERGY CO. OF CO	Terri Stathem; Regulatory	30-015-42778	
Eddy	MAM	CTB	3/10/2017	21	pMAM1706958060	3/31/2017	Canc	CIMAREX ENERGY CO. OF CO	Amithy Crawford; Regulato	30-015-25716	No surface commingle required, identical ownership
Eddy	MAM	CTB	1/27/2017	19	pMAM1702745806	2/15/2017	Canc	OXY USA INC	Taylor Stillman; Producti	30-025-41850	Cancelled applicant did not supply required information based on Hearing R-14299
Eddy	MAM	CTB	1/17/2017	0	pMAM1701747611	1/17/2017	Canc	OXY USA INC	Taylor Stillman; Producti	30-015-40250	Application was premature - Case 15540 was pending
Lea	MAM	CTB	9/30/2016	27	pMAM1627451309	10/27/2016	Canc	MATADOR PRODUCTION COMPAN	Sherri Gore; Regulatory t	30-025-42352	Cancelled; Operator resubmitted application with preliminary correct notice
Lea	MAM	CTB	9/12/2016	7	pMAM1625953438	9/19/2016	Canc	EOG RESOURCES INC	Stan Wagner; Regulatory a	30-025-43004	No administrative surface commingle application required
Eddy	MAM	CTB	3/23/2016	70	pMAM1608341258	6/1/2016	Canc	OXY USA INC	Taylor Stillman; Producti	30-015-42030	Application suspended, sent to hearing Cancelled by date timeout after 4/1/2016 suspension
Lea	MAM	CTB	3/9/2016	2	pMAM1607032859	3/11/2016	Canc	MACK ENERGY CORP	Jerry Sherrell; Productio	30-025-40180	Unable to administratively approve fixed or subtraction allocation methods for surface commingling; sent to hearing.
Lea	MAM	CTB	3/1/2016	10	pMAM1606159530	3/11/2016	Canc	MACK ENERGY CORP	Jerry Sherrell; Producti	30-025-40217	Requested surface commingle method not approvable administratively.
San Juan	MAM	DHC	8/21/2017	23	pMAM1723356800	9/13/2017	Susp	BP AMERICA PRODUCTION COM	Toya Colvin; Regulatory s	30-045-21789	Force majeure-Hurrican Harvey
Rio Arriba	MAM	DHC	4/26/2017	21	pKSC1711639225	5/17/2017	Canc	BP AMERICA PRODUCTION COM	Toya Colvin Toya.Colvin@	30-039-24163	Insufficient supporting data.

MAM = Michael McMillan, PRG = Philip Goetze, LEL = Leonard Lowe, WVJ = Will Jones



County	Engr	App	Received	Days	Permit/Application	Resolved	Status	Applicant	Contct	First_API	All Comments
Eddy	MAM	SWD	8/15/2017	9	pMAM1722752133	8/24/2017	Susp	NGL WATER SOLUTIONS PFRMI	Chris Weyand; Engineer	pMAM1722752133	Striker1SWD#1;B-15-235-28E;Protested Chevron Striker1SWD#1;B-15-235-28E;Protested Chevron
Eddy	MAM	SWD	7/31/2017	0	pMAM1721254024	7/31/2017	Susp	MNA ENTERPRISES LTD CO	Eddy Seay; Agent	30-015-05893	Protested by 'chevron and ConococPhillips
Eddy	MAM	SWD	7/25/2017	7	pKSC1720832902	8/1/2017	Susp	RKI EXPLORATION & PRODUCT	Ashlee Fechino ashlee.f	pKSC1720832902	Protested Marathon Well Rustler Breaks SWD #1; API 30-015-pending; Protested Marathon
Eddy	MAM	SWD	7/3/2017	9	pKSC1718727107	7/12/2017	Canc	ROCKCLIFF OPERATING NFW M	Brian Wood brian@permit	30-015-22320	Protested Kaiser-Francis Cancelled-injection into known producing formation
Eddy	MAM	SWD	7/3/2017	10	pKSC1718735697	7/13/2017	Susp	DELAWARE ENERGY, LLC	Mikè McCurdy mmccurdy@d	pKSC1718735697	RUIZ SWD #1; RUIZ SWD #1; API 30-015-; Protested Alpha SWD Operating LLC Well RUIZ SWD #1; API 30-015-; Protested Alpha SWD Operating LLC
Lea	MAM	SWD	7/3/2017	3	pMAM1718754184	7/6/2017	Susp	CIMAREX ENERGY CO. OF CO	Amithy Crawford; Regulator	30-025-33633	NMSLO requests injection from 5338'-7425' NMSLO requests injection from 5338'-7425'
Lea	MAM	SWD	6/29/2017	0	pMAM1718146953	6/29/2017	Susp	JUDAH OIL LLC	Danny Holcomb; Agent	30-025-37160	Protested Mewbourne Oil Company
Lea	PRG	SWD	6/20/2017	8	pMAM1717136579	6/28/2017	Susp	SANTO OPERATING LLC	Loren Diede; Agent	pMAM1717136579	Ocotillo SWD#1; J-15-255-34E; 30-025-pending; Suspended EOG Resources protest EOG Resources iwthdrew protest-back to admin process
Lea	MAM	SWD	6/20/2017	0	pMAM1717140969	6/20/2017	Canc	CHEROKEE DISPOSAL, LLC	Eddie Seay; Agent	30-025-21673	Sallie Anderson#1; C-25-95-34E; Bough injection; cancelled eceipts surface owner, affected parties, and swab test of interval had oil, and pumped 8 BOPD
Eddy	MAM	SWD	5/22/2017	8	pMAM1714233624	5/30/2017	Canc	ROCKCLIFF OPERATING NFW M	Brian Wood; Agent	30-015-33783	Protested BTA, Chevron, Kaiser-Francis. Applicant withdrew application
Eddy	MAM	SWD	5/12/2017	11	pMAM1713255815	5/23/2017	Canc	OWL SWD OPERATING, LLC	Steve Pattee; Engineer	pMAM1713255815	Scrute Farms SWD#1; M-4 T26SR28E; Protested COG. Cancelled by Applicant
Eddy	MAM	SWD	5/8/2017	22	pMAM1712835977	5/30/2017	Canc	ROCKCLIFF OPERATING NFW M	Brian Wood; Agent	30-015-26368	Protested Chevron. Applicant withdrew application
Lea	MAM	SWD	5/5/2017	0	pMAM1712534121	5/5/2017	Canc	PERMIAN TDS, LLC	Eddie Seay; Agent	30-025-32750	well bore diagram does not match well file
Lea	MAM	SWD	5/1/2017	2	pMAM1712229015	5/3/2017	Susp	BTA OIL PRODUCERS, LLC	Kay McConnell; Regulatory	30-025-34628	Protested Devon Energy Corporation and NMSLO

County	Engr	App	Received	Days	Permit/Application	Resolved	Status	Applicant	Contct	First_API	All Comments
Eddy	PRG	SWD	10/31/2016	3	pPRG1630829712	11/3/2016	Canc	DELAWARE ENERGY, LLC		pPRG1630829712	Enciso Fed. SWD #1; D-35-215-27E; 1095 FNL/2090 FEL Protested by Finley; application not complete.
Eddy	MAM	SWD	10/24/2016	100	pMAM1630056805	2/1/2017	Canc	DAKOTA RESOURCES INC	Pam Morphew; Vice Preside	30-015-25006	Cancelled injection zone same interval as producing zone in AOR
Eddy	PRG	SWD	10/24/2016	2	pMAM1630053276	10/26/2016	Canc	DELAWARE ENERGY, LLC	Preston Stein; Vice Presi	pMAM1630053276	RuizSWD#1;suspended/; no Aff.pub;no return receipt;no wellbore diagram.
Eddy	MAM	SWD	10/3/2016	37	pMAM1627852869	11/9/2016	Canc	SOLARIS WATER MIDSTREAM,	Brian Wood; Agent	30-015-42813	Original Operator cancelled existing permit. New applicant must submit new application
Lea	PRG	SWD	9/26/2016	21	pKSC1627135862	10/17/2016	Canc	MESQUITE SWD, INC	Kay Havenor Agent (575) 6	30-025-23895	Suspended improper affidavit of publicaiton. 10 days from suspension or will be cancelled WELL: 7811 V-P Vaca Draw Unit SWD #1; API # 30-025-23895
Lea	PRG	SWD	9/26/2016	32	pMAM1627054773	10/28/2016	Canc	STEARNS	Danny Holcomb; agent	30-025-34070	Application cancelled; Improper notice
Lea	PRG	SWD	9/15/2016	30	pMAM1626333518	10/15/2016	Susp	LYNX PETROLEUM CONSULTANT	Larry R. Scott; President	30-025-37943	Suspended until Delaware or other issues are resolved
Eddy	MAM	SWD	9/13/2016	17	pMAM1625951963	9/30/2016	Canc	DELAWARE ENERGY, LLC	Preston Stein; Vice Presi	30-015-20966	Miss SWD application (did not see this on Pool No. dropdown)
Chaves	MAM	SWD	9/2/2016	41	pKSC1625231643	10/13/2016	Canc	HUNT CIMARRON LIMITED PAR	Eddie W Seay Agent	30-005-62632	Have all return receipts. 15-day notice start 10-04-2016; out of 5.9 compliance
Chaves	PRG	SWD	8/17/2016	5	pMAM1623132036	8/22/2016	Canc	HUNT CIMARRON LIMITED PAR	Eddy Seay; Agent	30-005-62632	Suspended; improper notice of publication, no return receipt, verify surface owner
Eddy	PRG	SWD	8/3/2016	12	pMAM1621755415	8/15/2016	Canc	DELAWARE ENERGY, LLC	Preston Stein;Vice Presid	pMAM1621755415	Iceman StateSWD#1;30-015-pending;cancelled no affidavit of publication, no return receipt, incorrect 1/2 mile AOR
San Juan	PRG	SWD	7/18/2016	0	pMAM1620058222	7/18/2016	Susp	VISION ENERGY GROUP LLC	Brian Wood/Permit West; a	30-045-35578	Multiple: BLM (APD), NNEPA and EPA Region 9 (UIC Prog) Suspended pending investigation
Eddy	PRG	SWD	6/27/2016	0	pMAM1618050843	6/27/2016	Susp	CHI OPERATING INC	Brain Wood; Agent	30-015-33790	Capitan Reef
Lea	PRG	SWD	6/24/2016	0	pMAM1617656987	6/24/2016	Canc	DELAWARE ENERGY, LLC	Preston Stein; Vice-presi	30-025-32231	Cancelled 06-24-16; no notification of affected parties and affidavit of publ.; 06/30/2016 protested by Yates Pet/MYCO (Larson)
Eddy	PRG	SWD	6/17/2016	61	pMAM1617250033	8/17/2016	Canc	MESQUITE SWD, INC	Kay Havenor; Agent	pMAM1617250033	Cedar Canyon SWD#1; 30-015-pending; S8 T24S R29E Need to add comments on this one...