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

APPLICATION OF MESQUITE SWD, INC. TO AMEND ADMINISTRATIVE ORDER SWD-1696 FOR A SALT WATER DISPOSAL WELL IN EDDY COUNTY, NEW MEXICO.

CASE NO. 16308

DECLARATION OF STEVEN NAVE

- I, Steven Nave, make the following declaration based upon my own personal knowledge.
- 1. I am over eighteen (18) years of age and am otherwise competent to make this Declaration.
- 2. I am the president of Nave Oil and Gas, which is a fishing tool company that performs fishing operations in several areas, including the area of Southeastern, New Mexico.
- 3. I worked as a fisherman for Star Tool Company, a fishing tool company, from 1980 until 2001. I later became a partner in Star Tool Company until that company was sold. I then later started my own company, Nave Oil and Gas, which also performs fishing operations. Over the years, I have developed expertise in fishing operations and I have performed fishing operations on Devonian salt water disposal wells located within Southeastern, New Mexico.
- 4. I am familiar with the application that Mesquite SWD, Inc. has filed in this matter, and I have conducted a study related to the area which is the subject matter of that application.
- 5. The applicant, Mesquite SWD, Inc. (Mesquite) (OGRID 161968), seeks an order amending administrative order SWD-1696, approving the Mesa Verde SWD Well No. 3 to allow

an increase in the size of disposal tubing from a tapered string, using 5 ½" or smaller tubing inside of the surface and intermediate casings, and a 4 1/2" or smaller tubing inside the liner to allow for the use of tapered string tubing that is 7" by 5 ½".

- 6. Based on my experience as a fisherman, it is my opinion that there is sufficient clearance to perform fishing operations based on the tubing and casing information presented at hearing on July 12, 2018. My company performs fishing operations in situations involving similar dimensions and clearances.
- 7. Fishing can be performed through different methods; such as through the use of overshot tools, spear fishing tools, and (if needed) cutting tools.
- 8. Recently, I supervised a fishing job which involved a horizontal Wolfcamp well which had casing with a diameter of 7" by 5 ½". In that situation, my company was able to mill off the collar and use overshot tools to latch on to the piping that needed to be fished out of the well.
- 9. In my opinion, fishing operations could be successfully performed even at deeper depths for Devonian disposal wells provided that a sufficient rig is obtained for the operation.

I declare under penalty of perjury that the foregoing is true and correct.

Stephan Mave DATE