

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

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**APPLICATION OF LIGHTNING DOCK
GEOTHERMAL HI-01, LLC FOR APPROVAL
TO INJECT INTO A GEOTHERMAL AQUIFER
THROUGH THREE PROPOSED GEOTHERMAL
INJECTION WELLS AT THE SITE OF THE
PROPOSED LIGHTNING DOCK GEOTHERMAL
POWER PROJECT, HIDALGO COUNTY, NEW
MEXICO**

CASE NO. 15357

**APPLICATION OF LIGHTNING DOCK
GEOTHERMAL HI-01, LLC TO PLACE WELL
NO. 63A-7 ON INJECTION-GEOTHERMAL
RESOURCES AREA, HIDALGO COUNTY, NEW
MEXICO**

**CASE NO. 15365
Order No. R-14021-B**

**NOTICE OF INTERVENTION BY THE HIDALGO SOIL & WATER
CONSERVATION DISTRICT**

COMES NOW, the Hidalgo Soil & Water Conservation District ("HSWCD") by and through their counsel of record, the Domenici Law Firm, PC (Pete V. Domenici, Jr., Esq.) and for its Notice of intervention states:

1. HSWCD is a Soil and Water Conservation District established pursuant to applicable New Mexico Statutes and regulations. The District includes the portion of Hidalgo County where the injection well at issue is located.
2. HSWCD is concerned on behalf of its members with adverse impacts that might occur to groundwater that is or might be available for domestic, livestock, agriculture or other purposes within the boundaries of the District and which might subsequently integrate with surface waters within the District.
3. Based on information provided to date, HSWCD is concerned that the injection proposed

by the applicant may adversely impact groundwater which could adversely impact or adversely affect the District's objectives and concerns.

WHEREFORE, HSWCD provides Notice that it is intervening in the hearing scheduled in this matter for September 10, 2015 and intends to cross examine witnesses and requests that the applicant be required to demonstrate that it meets all applicable statutory and regulatory requirements and that its actions will not adversely impact the ground water and related resources.

Respectfully submitted,

/s/Pete V. Domenici, Jr.
Pete V. Domenici, Jr., Esq.
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I certify that a copy of the foregoing was sent to counsel of record on this 3rd day of September 2015.

/s/Pete V. Domenici, Jr.
Pete V. Domenici, Jr., Esq.