May 17, 2016

Jim Griswold
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe NM 87505

Dear Mr. Griswold:

On April 14, 2016, it came to my attention that the use of the newly drilled injection well 13-7 belonging to Lightning Dock Geothermal (LDG) caused damage to well A-603/12-7 belonging to Mr. McCants.

I received photos of well 12-7 taken on March 25 that show a locked cap hinge and well head broken off. The photos show evidence of mud and soil movement surrounding the well. This was caused by an apparent overflow likely caused by fluids injected under high pressure by LDG from their nearby injection well 13-7.

On April 30, I received another set of photos showing that the overflow from well 12-7 continues.

On May 4, I visited the site with Mr. Randy Walter who leases Mr. McCants’ land and saw the damage with my own eyes. I also visited Mr. McCants’ well 52-7 near his house and saw evidence of similar damage.

The Hidalgo Soil & Water Conservation District (HSWCD) is concerned about what appears to be an illicit discharge and requests that all injection into well 13-7 cease until our board receives a report about this incident from the OCD. HSWCD suspects that mixing injection fluids with fresh water occurred and that this may not be the only incident of illicit mixing. As a party to the hearing in Santa Fe in September/October 2015, HSWCD raised its concerns about the likelihood of such incidents. After that hearing, the Oil Conservation Commission (OCC) issued an order calling for collection of water samples for quality analysis and submission of that data to the OCD. The order further states this data be public and not held confidential.

Therefore, HSWCD requests to receive this information before injection in well 13-7 resumes. HSWCD also requests sample data from other wells in the area as mixing of injection fluids with fresh water may have occurred on other sites.

Sincerely,

Meira Gault
HSWCD Supervisor

cc: Ryan Flynn, Sec. of Env. and Natural Resources 1190 South St. Francis Drive, Santa Fe, NM 87505
Tom Blaine, P.E., New Mexico State Engineer, 407 Galisteo St., Ste. 101, Santa Fe, NM 87501
Susanna Martinez, Governor