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**From:** Donnie Lambert <donnie.lambert00@gmail.com>  
**Sent:** Friday, November 10, 2017 5:36 PM  
**To:** Sidney Hill  
**Subject:** FW: SandRidge Exploration and Production, LLC - Roadrunner 03 1201 Well No. 1  
**Attachments:** Earthquakes-Energy Wire Report November 3, 2015.docx; SandRidge Lawsuit Seventy-Five Million.docx

Dear Mr. Hill,

I am sending you the same correspondence I sent to you on December 7, 2015. County Commissioners conceded during this time in a public meeting they knew little or nothing about oil and gas drillings. The state oil and gas commissioner stated in a public meeting they did not have the manpower to oversee such drillings.

I am well aware that SandRidge pulled their application, but AmRep/OuterRim is still trying to gain a foothold at the expense of our water, hearing, damaged lands; and possibly health. I am stating my objections to the proposed amended ordinance to No. 10-11-18-7A for the same reasons as I stated them on December 7, 2015. In addition this ordinance will still pertain to AmRep and Outer Rim's drillings. How many times does this body have to listen to the outpouring of anger from its constituents before you hear the message?

Sincerely,

Donnie Lambert  
248 El Camino Loop NW  
Rio Rancho, NM 87144  
(Registered voter in the City of Rio Rancho and Sandoval County)

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**From:** Donnie Lambert [mailto:donnie.lambert00@gmail.com]  
**Sent:** Monday, December 07, 2015 3:51 PM  
**To:** 'Cthomas@sscafca.com' <Cthomas@sscafca.com>; 'SSENSANBAUGHER@ci.rio-rancho.nm.us' <SSENSANBAUGHER@ci.rio-rancho.nm.us>; 'KEITH RIESBERG' <KRIESBERG@ci.rio-rancho.nm.us>  
**Cc:** 'mhill@sandovalcountynm.gov' <mhill@sandovalcountynm.gov>  
**Subject:** SandRidge Exploration and Production, LLC - Roadrunner 03 1201 Well No. 1

To the Sandoval County Planning Commission – Mr. Makita Hill

I. Mr. Hill,

Please take this notification as my opposition to the drilling of the Roadrunner 03 1201 Well No. 1 and any future drillings by this company at the proposed location for the following reasons:

- 1.) No feasibility, environmental impact or Geological studies have been performed by the State of NM, County of Sandoval or City of Rio Rancho regarding the proposed drilling site, except for the plans issued by SandRidge Exploration and Production, LLC. I will stand corrected if I am wrong on these points.
- 2.) SandRidge Exploration and Production, LLC state they will perform vertical drilling, but have not ruled out hydraulic fracturing to achieve production at a depth of 10,500' (deep well as opposed to a shallow drilling) on this well or any other New Mexico permitted drillings by the State.
- 3.) Mike Soraghan, E&E Reporter by way of EnergyWire reports on Tuesday, November 3, 2015, the Sierra Club has issued a Notice of Intent to Sue under federal environmental laws four oil companies, alleging violation of the

Resource Conservation and Recovery Act (RCRA), of which SandRidge Exploration and Production, LLC is a party to the action as a defendant, and have been linked to hundreds of earthquakes occurring in Oklahoma, Arkansas, Colorado, Texas, Ohio, New Mexico and West Virginia with suspected links to wastewater from oil and gas operations. (attached above)

- 4.) On June 9, 2013, A Connecticut federal judge rejected SandRidge Energy, Inc.'s bid to toss out an investor lawsuit accusing the oil drilling company of misrepresenting the expected returns of a \$75 million drilling project, saying the plaintiffs [against SandRidge] had adequately supported their fraud claims. (attached above).
  - 5.) Between December 2012 and March 2013, seven putative shareholder derivative actions were filed in state and federal court in Oklahoma as filed in the U.S. District Court for the Western District of Oklahoma.
  - 6.) It is unclear if 62 or 63± other wells have been permitted to this company by the State of New Mexico, and if 10,000 bbls of water will be used in the drilling of one well, or 630,000 bbls eventually will be used for drilling purposes throughout the area over a period of time.
  - 7.) On November 10, 2015, SandRidge submitted a letter to Makita Hill, final paragraph, which states "SandRidge submitted to the Planning and Zoning Division a request to waive the pre-application public meeting, as there is no existing community that is near or surrounds the proposed Project location." I live in the newly developed Camino Crossing Subdivision at Northern and Rainbow along with 176 other residents within three miles of the proposed Project, and hundreds of other residents live outside the Camino Crossing Subdivision within five miles of the proposed site, and some of whom may live within or closer than one mile, surrounding the proposed Project, which encompasses City municipal water storage facilities and water wells. There is a concern on my part as well as other owners, residents in the area as to the preparation by the State, City or County and as to the protection of the resources, health and property of those living in the area as well as concern for waste water management of the Roadrunner 03 1201 Well No. 1 and any future drillings caused by SandRidge Exploration and Production, LLC once the County approves a creation of Special Use (S-P) District, Creation of a Master Planned (M-P) District, or Change of an urban residential zone to any other classification.
- II. Mr. Thomas, in your November 20, 2015, response to Makita Hill, Long Range Senior Planner for Sandoval County Commission, and regarding the above referenced's request to have an Agency Review for Zone Change Request in Rio Rancho Estates, you stated that the proposed site exceeded one acre, so the company should develop and maintain a SWPP for the project. That was your only comment to the zoning commission regarding the drilling of a 10,500' oil well referenced above.

My questions to all of you, Mr. Thomas, Mr. Sensanbaugher, Mr. Riesberg and Mr. Hill:

- 1.) What environmentally effect would the drilling to a depth of 10,500 feet (deep well) whether vertically or by hydraulic fracturing, because the applicant did not negate that type of drilling in their application, have on the environment should flooding of the area during heavy rains, spilling, runoff, or eruption occur within an area of 5-10 or more miles of the well, and the effect on the municipal water supply given the wells and water becomes polluted by such runoff or fragmentation of the water supply or ground surfaces?
- 2.) What environmentally, physical, mental or emotional effect would each of you consider the drilling to a depth of 10,500 feet whether vertically or by hydraulic fracturing, have on the hundreds of residents living in the area within a 3-5 mile radius of the well and the municipal water supply, earth movement, or future wells to be drilled by SandRidge Exploration and Production, LLC given the above-attached information regarding this company in Oklahoma, and other states as well as New Mexico, and the lawsuit(s) filed by investors against this company?
- 3.) What types of feasibility, geological, or environmental or health impact studies have you performed regarding a deep drilling within the county or local area to the proposed drilling site by SandRidge Exploration and Production, LLC?
- 4.) Do you really feel that this company, given the information attached above, would cart drilling fluids by truck more than 100 miles to Aztec, NM, if more than one well is drilled as explained in their application? It is my opinion they will form a tank battery or batteries to hold production of the wells, and may use drilling ponds or

injection wells to dispose of drilling fluids once the commission approves a zone change considering the fact this application only involves one well, and it is believed that the State of New Mexico issued as many as 63 drilling permits?

Thank you for your consideration. Please accept this letter into the record.

(Ms.) Donnie Lambert  
248 El Camino Loop NW  
Rio Rancho, NM 87144  
(505) 712-7157

Mailing Only: 201 Pinnacle Drive, SE, Apt. 2321, Rio Rancho, NM 87124

## **EARTHQUAKES:**

### **Sierra Club threatens to sue drillers to stop Okla. shaking**

[Mike Soraghan](#), E&E reporter

EnergyWire: Tuesday, November 3, 2015

The Sierra Club is threatening to sue four oil companies, alleging their wastewater disposal operations have caused hundreds of earthquakes in Oklahoma.

The group's call for the drillers to curtail operations is the first major move by a national environmental group in response to Oklahoma's earthquake swarms. Until now, it primarily has been local activists and a handful of people who have filed lawsuits.

"Oklahoma is literally being shaken to its core by the operations of these oil and gas companies," said Paul Bland, executive director of Public Justice, which has teamed with the Sierra Club for the legal action. "There is a clear and present danger posed by these irresponsible operations. If the energy companies do not voluntarily take action to stop it, we will take them to court."

Public Justice and the Sierra Club yesterday released a [notice of intent to sue](#) under federal environmental laws.

The letter names four companies: Chesapeake Energy Corp., Devon Energy Corp., New Dominion LLC and SandRidge Energy Inc. Chesapeake, Devon and New Dominion declined to comment. Officials with SandRidge did not respond to requests for comment.

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The letter calls on the companies, which all have high-volume disposal operations in Oklahoma, to reduce the amount of waste fluid they're injecting into deep disposal wells. It also says they should reinforce vulnerable structures and establish an "independent forecasting body" to study the seismic effects of deep injection.

If the companies don't meet those demands in the next 90 days, the letter says, the Sierra Club will file a lawsuit in federal court.

The hope is that a federal judge would step in and declare moratoriums in some areas and restrict the volumes that companies can inject and the pressures they use to force the fluid down. State officials have said they lack the authority to impose a moratorium, though they've shown no desire to do so.

Putting it under a federal judge "takes the politics out of the process," said Scott Poynter, a Little Rock, Ark., lawyer who is part of the legal team pursuing the case. He is currently suing New Dominion on behalf of a woman injured in a November 2011 quake. He has also filed a class-action suit.

Oklahoma had 585 earthquakes last year of magnitude 3 or greater and has already had more than 740 such quakes this year. The Sierra Club's letter says there aren't just more of them than last year -- they're also getting bigger.

Scientists say the unprecedented swarms of man-made earthquakes are likely the result of favorably aligned faults and production methods in Oklahoma that create uniquely large volumes of wastewater. The fluid seeps into the faults, changing the pressure, and they slip.

The Sierra Club's letter says that the quakes have occurred near wells belonging to the four named companies or along faults close to the companies' wells.

Arkansas, Colorado, Texas, Ohio, New Mexico and West Virginia have also had quakes with suspected links to wastewater from oil and gas operations. Additionally, the swarm in north-central Oklahoma has pushed north into Kansas.

Scientists at the U.S. Geological Survey began warning in 2012 that a "remarkable" surge in earthquakes in Oklahoma and the middle of the country was likely linked to disposal operations.

# SandRidge Can't Escape Suit Over \$75M Oil Project

By **Keith Goldberg**

Law360, New York (July 1, 2013, 4:53 PM ET) -- A Connecticut federal judge on Saturday rejected SandRidge Energy Inc.'s bid to toss an investor lawsuit accusing the oil drilling company of misrepresenting the expected returns of a \$75 million drilling project, saying the plaintiffs had adequately supported their fraud claims.

The plaintiffs brought the suit against SandRidge, three of its top executives and several board members in August 2011, claiming they were defrauded when they purchased interest in SandRidge's project, which took place in a West Texas gas field. In moving to [dismiss the suit](#), SandRidge argued that the seven plaintiffs had failed to identify the alleged misrepresentations, failed to state their losses were caused by SandRidge, and failed to allege scienter, or the intention to deceive, manipulate or defraud.

SandRidge also argued that the plaintiffs lacked standing because the company had made no representations at to five of the plaintiffs, who purchased their shares from the sixth plaintiff, Patriot Exploration LLC, which had signed an agreement with SandRidge to fund the project in 2009. Patriot didn't have standing because it subsequently sold its entire share to investors, and therefore failed to plead it had suffered a loss, SandRidge argued.

The seventh plaintiff is Patriot CEO Jonathan Feldman.

However, U.S. District Judge Alvin W. Thompson said SandRidge made the alleged misrepresentations to Patriot with the knowledge that they would be conveyed to the other plaintiffs.

"Because each of the plaintiffs has alleged an injury, even where merely consequential, as a result of fraudulent misrepresentations made by the defendants, and on which that plaintiff was entitled to rely, the plaintiffs do not lack standing with respect to the fraud claims," Judge Thompson said.

The judge also said the plaintiffs had sufficiently identified the alleged misrepresentations, showed that those statements caused their losses and that SandRidge acted with scienter.

Judge Thompson also retained securities fraud claims against former SandRidge CEO Tom Ward, former president and chief operating officer Matthew K. Grubb, and former executive vice president Rodney Johnson. However, he tossed all but two liability claims against current board members Jeffrey Serota, Everett Dobson, William Gilliland and Roy Oliver Jr., as well as former board member Daniel Jordan.

Each plaintiff claims SandRidge overstated the expected returns from the gas in its wells by concealing the loss of natural gas during the treatment process, overstating the amount of

average reserves of methane gas per well, improperly referring to the final sale price for methane gas and understating the expenses associated with methane production from its wells.

Counsel for SandRidge couldn't immediately be reached for comment Monday.

The plaintiffs are represented by Keith Fleischman of [Fleischman Law Firm](#), and Joseph Martini of [Wiggin & Dana LLP](#).

SandRidge is represented by David J. Elliott and Kaitlin A. Canty of [Day Pitney LLP](#) and C. William Phillips of [Covington & Burling LLP](#).

The case is Patriot Exploration LLC et al. v. SandRidge Energy Inc. et al., case number [3:11-cv-01234](#), in the U.S. District Court for the District of Connecticut.

--Additional reporting by Maria Chutchian. Editing by Kat Laskowski.