

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

**APPLICATIONS OF PERMIAN OILFIELD
PARTNERS, LLC TO APPROVE SALT WATER
DISPOSAL WELL IN LEA COUNTY, NEW MEXICO. CASE NOS. 23807-23808**

CONSOLIDATED PRE-HEARING STATEMENT

Permian Oilfield Partners, LLC ("Permian") submits this Consolidated Pre-Hearing Statement for the above-referenced cases pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Permian Oilfield Partners, LLC

ATTORNEY

Deana M. Bennett
Earl E. DeBrine
Yarithza Peña
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P. O. Box 2168
Albuquerque, New Mexico 87103-
2168
(505) 848-1800

OTHER PARTIES

**MRC Permian Company and
Matador Production Company**

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

STATEMENT OF CASES

APPLICANT:

In Case No. 23807, Permian Oilfield Partners, LLC seeks an order approving disposal into the Silurian-Devonian formation through the Overdue Federal SWD Well #1 well at a surface location 602' from the North line and 298' from the East line, Unit A, Section 5, Township 20 South, Range 34 East, NMPM, Lea County, New Mexico for the purpose of operating a produced water disposal well. Applicant seeks authority to inject produced water into the Silurian-Devonian formation at a depth of approximately 14,675 feet to 15,844 feet. Applicant further requests that the Division approve a maximum daily injection rate for the well of 50,000 bbls per day. Said area is located approximately 18 miles west of Monument, New Mexico.

In Case No. 23808, Permian Oilfield Partners, LLC seeks an order approving disposal into the Silurian-Devonian formation through the Belated Federal SWD Well #1 well at a surface location 637' from the South line and 208' from the East line, Unit P, Section 27, Township 19 South, Range 34 East, NMPM, Lea County, New Mexico for the purpose of operating a produced water disposal well. Applicant seeks authority to inject produced water into the Silurian-Devonian formation at a depth of approximately 14,639 feet to 15,841 feet. Applicant further requests that the Division approve a maximum daily injection rate for the well of 50,000 bbls per day. Said area is located approximately 18 miles west of Monument, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

WITNESS	ESTIMATED TIME	EXHIBITS
Landman: Sean Puryear	Approx. 15 minutes	Approx. 10
Geologist: Gary Fisher	Approx. 15 minutes	Approx. 5

Permian will be submitting exhibits in advance of the hearing. Permian reserves the right to supplement its witness list or its exhibits to rebut any witnesses or exhibits MRC Permian Company and Matador Production Company ("Matador") may advance.

PROCEDURAL ISSUES

These cases are currently set for a contested hearing on October 19, 2023. Matador has objected to the cases going to hearing by affidavit, which is immaterial for the reasons set forth in Permian's Response to MRC Permian Company's and Matador Production Company's Objection to

Proceeding by Affidavit filed on October 10, 2023. To briefly summarize, POP filed these cases for the sole purpose of setting an adjudicatory hearing to resolve Matador's concerns, which is required by the Division's rules and is consistent with Division practice. Thus, there is no basis for Matador's objections to these cases going by affidavit because Permian does not intend to proceed by affidavit nor would proceeding by affidavit be appropriate given Matador's objections. Further, there is no reason to delay these hearings given that Matador has been on notice of Permian's intent to proceed to hearing and Matador has been aware of its basis for protesting Permian's applications since at least July 18, 2023.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P.A.

By: /s/ Deana M. Bennett

Deana M. Bennett

Earl E. DeBrine

Yarithza Peña

Post Office Box 2168

500 Fourth Street NW, Suite 1000

Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800

Deana.Bennett@modrall.com

eed@modrall.com

yarithza.pena@modrall.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail this 12th day of October, 2023.

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
P.O. Box 2208
Santa Fe, NM 87504
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com

Attorneys for MRC Permian Company and Matador Production Company

/s/ Deana M. Bennett
Deana M. Bennett

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 275282

QUESTIONS

Operator: Permian Oilfield Partners, LLC PO Box 3329 Hobbs, NM 88241	OGRID: 328259
	Action Number: 275282
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	Not answered.
Testimony time (in minutes)	Not answered.