

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

**APPLICATION OF MESQUITE SWD, INC.
TO APPROVE PRODUCED WATER DISPOSAL
WELL IN EDDY COUNTY, NEW MEXICO**

CASE NO. 20313

**APPLICATION OF MESQUITE SWD, INC.
TO APPROVE PRODUCED WATER DISPOSAL
WELL IN EDDY COUNTY, NEW MEXICO**

CASE NO. 20314

MESQUITE SWD, INC.'S AMENDED PRE-HEARING STATEMENT

Mesquite SWD Inc. ("Mesquite") submits this amended Pre-Hearing Statement for the above-referenced cases pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Mesquite SWD, Inc.

APPLICANT'S ATTORNEY

Deana M. Bennett

OPPONENT

The New Mexico Oil Conservation Division

OPPONENT'S ATTORNEY

David K. Brooks
New Mexico Energy, Minerals
and Natural Resources
Department
1220 South St. Francis Drive
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OTHER PARTY

Kaiser-Francis

ATTORNEY

James Bruce (case 20314 only)
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STATEMENT OF CASES**APPLICANT:**

In Case No. 20313, Mesquite seeks an order approving disposal into the Siluro-Devonian formation through the Laguna Salada 13 SWD #1 well at a surface location 685 feet from the South line and 50 feet from the East line (Unit P) of Section 13, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico for the purpose of operating a produced water disposal well. Mesquite seeks authority to inject produced water into the Siluro-Devonian formation at a depth of approximately 14,500' to 15,700'. Mesquite further seeks approval of the use of 7 inch tubing inside the surface and intermediate casings and 5 ½ inch tubing inside the liner and requests that the Division approve a maximum daily injection rate for the well of 40,000 bbls per day.

In Case No. 20314: Mesquite seeks an order approving disposal into the Siluro-Devonian formation through the Laguna Salada 19 SWD #1 well at a surface location 1752 feet from the South line and 1727 feet from the East line (Unit J) of Section 19, Township 23 South, Range 29 East, NMPM, Eddy County, New Mexico for the purpose of operating a produced water disposal well. Mesquite seeks authority to inject produced water into the Siluro-Devonian formation at a depth of approximately 14,500' to 15,700'. Mesquite further seeks approval of the use of 7 inch tubing inside the surface and intermediate casings and 5 ½ inch tubing inside the liner and requests that the Division approve a maximum daily injection rate for the well of 40,000 bbls per day. Said area is located approximately 4.5 miles East of Loving, New Mexico

PROPOSED EVIDENCE**APPLICANT****WITNESSES****EST. TIME****EXHIBITS**

Clay Wilson

Approx. 10 min

Approx. 5

Riley Neatherlin

Approx. 20 min.

Approx. 5

Dr. Kate Zeigler – Geologist

Approx. 30 min.

Approx. 11

Scott Wilson - Engineer	Approx. 30 min.	Approx. 11
Todd Reynolds-Geologist/Geophysicist	Approx. 30 min.	Approx. 11

PROCEDURAL ISSUES

The Oil Conservation Division is protesting these Applications and has set these cases for hearing on May 31, 2019. The Oil Conservation Division has requested that these cases be consolidated with the other Mesquite case set for hearing on May 31, 2019. Mesquite does not object to that request, and also requests that these two cases be consolidated, and that they be consolidated with Case No. 20472.

Respectfully submitted,

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

By: Deana M. Bennett

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on May 23, 2019:

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