

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

**APPLICATION OF 3BEAR FIELD SERVICES, LLC  
FOR APPROVAL OF A SALT WATER DISPOSAL WELL,  
LEA COUNTY, NEW MEXICO**

**CASE NO. 20586**

**PRE-HEARING STATEMENT**

3Bear Field Services, LLC ("3Bear") provides this Pre-Hearing Statement as required by  
19.15.4.13 (A) NMAC.

**APPEARANCES**

**APPLICANT**

3Bear Field Services, LLC

**APPLICANT'S ATTORNEY**

Candace Callahan  
Beatty & Wozniak, P.C.  
500 Don Gaspar Avenue  
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**OPPONENTS**

Commissioner of Public Lands, New  
Mexico State Land Office

**OPPONENTS' ATTORNEYS**

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V-F Petroleum Inc.

Gary W. Larson  
Dana S. Hardy  
P. O. Box 2068  
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Applicant seeks an order authorizing the injection of produced water for disposal purposes through its proposed **Grama State SWD No. 2** (API pending), which will be located 351 feet from the north line and 215 feet from the west line (Lot 4, Unit D), Section 2, Township 22 South, Range 34 East, N.M.P.M., Lea County, New Mexico. The proposed injection disposal interval will be within the Devonian, Fusselman formation (SWD; Devonian-Silurian, Pool Code 97869) between 14,400 feet and 15,500 feet below the ground through an open hole completion. The maximum proposed daily injection rate will be approximately 30,000 barrels per day. The estimated average injection pressure is expected to be approximately 2,160 psi (surface pressure). The maximum injection pressure will be 2,880 psi (surface pressure). Disposal fluid will be produced salt water from oil and gas wells in the area producing from various formations, including the Yates, Bone Spring, Wolfcamp, Strawn and Morrow. The Applicant will demonstrate that the proposed injection well will not impair correlative rights of V-F or any other lessee, will prevent waste of State resources and will protect groundwater.

### **PROPOSED EVIDENCE**

#### APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBIT</u>
Alberto A. Gutierrez, RG Geolex, Inc.	Approx. 30 minutes	Approx. 15

OPPONENT Commissioner of Public Lands, New Mexico State Land Office

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBIT</u>
Anchor Holm	30 minutes	Approx. 10

OPPONENT V-F Petroleum Inc.

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBIT</u>
Unknown		

**PROCEDURAL MATTERS**

V-F Petroleum Inc has requested a continuance from July 11, 2019 to August 22, 2019, which Applicant opposes. If a motion for continuance is timely filed, a prehearing conference is requested for the purposes of hearing the motion on Tuesday, July 9th, 2019.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By: 

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*Attorneys for 3Bear Field Services, LLC*

**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 on July 3, 2019

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