

**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**

**AMENDED PRE-HEARING STATEMENT**

3Bear Field Services, LLC ("3Bear") provides this Amended 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  
Santa Fe, NM 87505  
Tel (505) 983-8764  
*ccallahan@bwenergyllaw.com*

**OPPONENTS**

Commissioner of Public Lands, New  
Mexico State Land Office

**OPPONENTS' ATTORNEYS**

Andrea Antillon  
Associate Counsel  
New Mexico State Land Office  
P.O. Box 1148  
310 Old Santa Fe Trail  
Santa Fe, New Mexico 987504  
(505) 827-5752  
(505) 827-4262 (fax)  
*aantillon@slo.state.nm.us*

V-F Petroleum Inc.

Gary W. Larson  
Dana S. Hardy  
P. O. Box 2068  
Santa Fe, NM 87504-2068  
Phone: (505) 982-4554  
Facsimile: (505) 982-8623  
glarson@hinklelawfirm.com  
dhardy@hinklelawfirm.com

NGL Water Solutions Permian, LLC.

Deana Bennett  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
Phone: (505) 848-1800  
[dmg@modrall.com](mailto:dmg@modrall.com)

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 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>
Ramona K. Hovey Lonquist & Co. LLC Petroleum Engineer	30 minutes	Approx. 4
Parker Jessee Lonquist & Co. LLC Geologist	20 minutes	Approx. 4
David A. White Geolex, Inc. Geologist	20 minutes	Approx. 1
Michael Solomon 3Bear Field Services, LLC SVP Engineering & Operations	10 Minutes	Approx. 2

3Bear reserves the right to call a rebuttal witness if appropriate.

### 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>
Dale S. Lubinski (Geologist)	30 minutes	Approx. 5
Jason Lodge (Geologist)	30 minutes	Approx. 5

OPPONENT NGL Water Solutions Permian, LLC

WITNESSES

EST. TIME

EXHIBIT

UNKNOWN

**PROCEDURAL MATTERS**

None.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By: 

Candace Callahan

500 Don Gaspar Avenue

Santa Fe, New Mexico 87505

(505) 983-8764

ccallahan@bwenergylaw.com

*Attorneys for 3Bear Field Services, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Amended Pre-Hearing Statement was served on the following counsel of record by electronic mail on October 24, 2019:

Andrea Antillon  
Associate Counsel  
New Mexico State Land Office  
P. O. Box 1148  
310 Old Santa Fe Trail  
Santa Fe, New Mexico 87504  
(505) 827-5752  
(505) 827-4262 (fax)  
*aantillon@slo.state.nm.us*

*Attorney for the Commissioner of Public Lands,  
New Mexico State Land Office*

Gary W. Larson  
Dana S. Hardy  
P. O. Box 2068  
Santa Fe, NM 87504-2068  
Phone: (505) 982-4554  
Facsimile: (505) 982-8623  
*glarson@hinklelawfirm.com*  
*dhardy@hinklelawfirm.com*

*Attorneys for V-F Petroleum Inc.*

Deana M. Bennett  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
Telephone: (505) 848-1800  
*dmb@modrall.com*

*Attorneys for NGL Water Solutions Permian, LLC*

  
\_\_\_\_\_  
Candace Callahan