

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

**APPLICATION OF DEVON ENERGY  
PRODUCTION COMPANY, L.P. FOR  
APPROVAL OF A SALTWATER DISPOSAL  
WELL IN EDDY COUNTY, NEW MEXICO**

**CASE NO. 20944**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by Foundation Energy Management, LLC as required by the Oil Conservation District under 19.15.4.13 NMAC.

**APPEARANCES**

**APPLICANT**

Devon Energy Production Company, LP

**APPLICANT'S ATTORNEY**

Holland & Hart, LLP

**OPPONENTS**

Foundation Energy Management, LLC

**OPPONENT'S ATTORNEY**

Mani, Little & Wortmann, PLLC

**STATEMENT OF THE CASE**

**APPLICANT**

Devon seeks authorization to inject produced water for purposes of disposal through the existing Sand 19 Federal 001 (API No. 30-025-25017). A Form C-108 was filed with the Division in July and notice of the administrative application provided to all affected parties. The administrative application was protested by Foundation Energy Management, LLC (Foundation) in August. Accordingly, Devon filed an application for a hearing before a Division examiner.

The proposed disposal well is located 1,980 feet from the north line and 660 feet from the east line (Unit H), Section 18, Township 23 South, Range 32 East, NMPM, Lea County, New Mexico. The proposed injection interval will be the Devonian/Silurian and Fusselman formations [SWD; Devonian (Pool Code 96101)] between 16,700 feet and 18,000 feet through an open-hole completion. The estimated volume is 18,200 BWPD with a maximum surface injection pressure of 3,340 psi.

OPPONENT FOUNDATION ENERGY MANAGEMENT, LLC

Foundation Energy Management, LLC is concerned with the proximity of the proposed well site to its operations, and the potential negative impact on Foundation's operations in the area.

**POTENTIAL EVIDENCE**

APPLICANT

<b>WITNESSES Name and Expertise</b>	<b>ESTIMATED TIME IF NECESSARY</b>	<b>EXHIBITS</b>
Katie Dean, Landman	Approx. 10 mins.	3
Sloan Anderson Geologist	Approx. 10 mins.	3
Clifton Harlin, Engineer	Approx. 10 mins.	3

OPPONENT

**WITNESSES**

**Name and  
Expertise**

**ESTIMATED TIME IF  
NECESSARY**

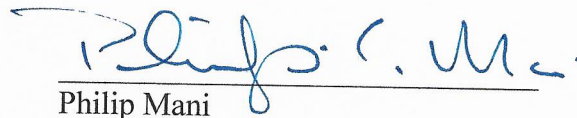
**EXHIBITS**

Philip C. Mani  
Attorney

Approx. 10 mins.

Respectfully Submitted

Mani Little & Wortmann, PLLC

A handwritten signature in blue ink, appearing to read "Philip C. Mani", is written over a horizontal line.

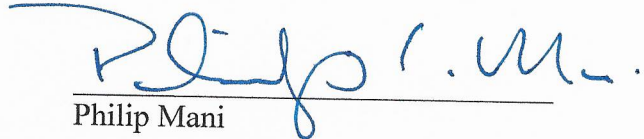
Philip Mani

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## CERTIFICATE OF SERVICE

I hereby certify that on this 6 day of December, 2019, a copy of the foregoing Entry of Withdrawal of Protest was served via email upon the following:

HOLLAND & HART LLP  
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Philip Mani