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

APPLICATION OF ADVANCE ENERGY PARTNERS HAT MESA LLC FOR APPROVAL OF A PRODUCED WATER DISPOSAL WELL, LEA COUNTY, NEW MEXICO

Case No. 20827

# ADVANCE ENERGY PARTNERS, LLC'S PRE-HEARING STATEMENT

Advance Energy Partners, LLC ("Advance") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

#### **APPEARANCES**

Advance is the applicant in this case. Its business address is 11490 Westheimer Rd., Suite 950, Houston, TX 77077. Advance is represented by the undersigned counsel.

#### STATEMENT OF THE CASE

Advance seeks an order approving the proposed Quick Shot Unit SWD No. 1 well, which will have a surface location in Unit H in Section 6, Township 22 South, Range 33 East, NMPM, in Lea County, New Mexico. Advance requests authorization to inject produced water into the well for disposal in the Devonian, Silurian, and Upper Ordovician Formation at a depth of 16,502 to 17,500 feet. Advance further requests that the Division approve a maximum injection pressure of 3,285 psi. The well is located approximately 29 miles west of Eunice, New Mexico. The granting of Advance's application will prevent waste and protect correlative rights.

## PROPOSED EVIDENCE

WITNESS	ESTIMATED TIME	<b>EXHIBITS</b>
Paul Burdick (Landman)	10 minutes	Approximately 4
Don Glover (Engineer)	15 minutes	Approximately 4
Edward Caamano (Geologist)	15 minutes	Approximately 4

Advance reserves the right to call a rebuttal witness(es) if appropriate.

### **PROCEDURAL MATTERS**

If there is no opposition to Advance's application, it will present its case by affidavit.

Respectfully submitted,

HINKLE SHANOR LLP

Dana S. Hardy Dioscoro A. Blanco

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554 Facsimile: (505) 982-8623 <u>dhardy@hinklelawfirm.com</u> <u>dblanco@hinklelawfirm.com</u>

Counsel for Advance Energy Partners Hat Mesa LLC

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of January, 2020 I served a true and correct copy of the foregoing *Pre-Hearing Statement* by electronic mail on the following counsel of record.

Dana S. Hardy

Deana M. Bennett Modrall, Sperling, Roehl, Harris & Sisk, P.A. Post Office Box 2168 Santa Fe, NM 87103-2168 deana.bennett@modrall.com

Counsel for NGL Water Solutions Permian, LLC

3