

Davidson, Florene, EMNRD


From: Michael Feldewert <MFeldewert@hollandhart.com>
Sent: Thursday, November 12, 2015 12:57 PM
To: Jones, William V, EMNRD; Wade, Gabriel, EMNRD
Cc: epadillapl@qwestoffice.net; Davidson, Florene, EMNRD; Jordan L. Kessler
Subject: Case 15345: LG&S Application for an SWD: Late filing of Devon's prehearing statement
Attachments: 2033_001.pdf

Gentlemen: I just discovered that the prehearing statement drafted for service and filing last Thursday was not served or filed. My secretary was injured while coming to work last Thursday, missed the rest of the day, and in the transition to another secretary this prehearing statement was neither filed nor served on Mr. Padilla as the attorney for LG&S.

I alerted Mr. Padilla late this morning to this circumstance and have attached the prehearing statement we are filing and serving today. I believe that the parties anticipated a contested case, which was why it was placed at the end of the docket. I therefore respectfully request that Devon be allowed to present the witnesses that have flown in for today's hearing, despite the late filing of this prehearing statement.

Thank you for your consideration of this matter.

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HOLLAND & HART 

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

RECEIVED OGD
2015 NOV 12 P 1:01

**APPLICATION OF LG&S OIL COMPANY, LLC FOR APPROVAL OF A SALT
WATER DISPOSAL WELL, EDDY COUNTY, NEW MEXICO.**

CASE NO. 15345

DEVON'S PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Devon Energy Production Company, L.P. a party objecting to this application.

APPEARANCES

APPLICANT

LG&S Oil Company, LLC

ATTORNEY

Ernest L. Padilla
Padilla Law Firm, P.A.
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OBJECTING PARTIES

Devon Energy Production Company, L.P.

ATTORNEY

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DEVON'S STATEMENT OF THE CASE

LG&S seeks authority to utilize the Keohane B Federal 3 Well (API No. 30-015-05625) located in the SE/4 NW/4 (Unit F) of Section 28, T-18-S, R-31-E, to inject salt water into the Queen formation at perforated intervals from 3,280 to 3,570 feet. Devon Energy owns oil and gas leases covering the Queen formation in Section 28 that will be negatively impacted by the proposed disposal well.

DEVON'S PROPOSED EVIDENCE

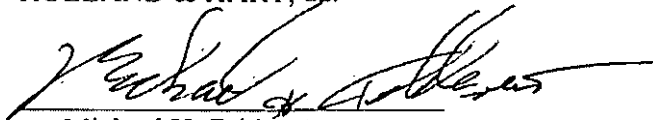
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Meg Muhlinghaus Landman	Approx. 10 minutes	Approx. 5
Zach Poland Petroleum Geologist	Approx. 15 minutes	Approx. 4
Kevin Smith Petroleum Engineer	Approx. 15 minutes	Approx. 6

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART, LLP



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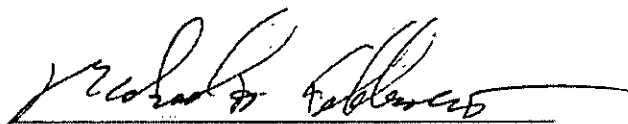
ATTORNEYS FOR
DEVON ENERGY PRODUCTION COMPANY, L.P.

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2015, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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A handwritten signature in black ink, appearing to read "Michael H. Feldewert", is written over a horizontal line.

Michael H. Feldewert
Jordan L. Kessler