



**MONTGOMERY
& ANDREWS**
LAW FIRM

J. SCOTT HALL
Cell: (505) 670-7362
Email: shall@montand.com
www.montand.com

May 12, 2016

HAND-DELIVERED

Florene Davidson
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Application of High Roller Wells LLC – Case No. 15278 *De Novo*

Dear Ms. Davidson:

Enclosed please find for filing the original and one copy of Applicant's Pre-Hearing Statement. Also enclosed are six Exhibit Notebooks for the hearing on May 19, 2016 in the above matter.

Thank you.

Very truly yours,

J. Scott Hall

Enclosures

cc (w/encs.): Ocean Munds-Dry (via email and hand-delivery)
James Bruce, Esq. (via email, Pre-Hearing Statement only)

REPLY TO:

325 Paseo de Peralta
Santa Fe, New Mexico 87501
Telephone (505) 982-3873 • Fax (505) 982-4289

Post Office Box 2307
Santa Fe, New Mexico 87504-2307

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

APPLICATION OF HIGH ROLLER WELLS LLC
FOR AUTHORIZATION TO INJECT, EDDY
COUNTY NEW MEXICO

Case No. 15278 *De Novo*

APPLICANT'S PRE-HEARING STATEMENT

High Roller Wells LLC, ("Applicant") provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

High Roller Wells LLC

APPLICANT'S ATTORNEY

J. Scott Hall, Esq.
Seth C. McMillan, Esq.
MONTGOMERY & ANDREWS, P.A.
P.O. Box 2307
Santa Fe, NM 87504-2307
Tele (505) 982-3873
shall@montand.com
smcmillan@montand.com

OPPONENT/OTHER PARTIES

COG Operating

OPPONENT'S ATTORNEY

Ocean Munds-Dry
COG Operating LLC
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
Tele (505) 780-8000
Facsimile (505) 428-0485
omundsdry@concho.com

Mewbourne Oil Company

James Bruce, Esq.
P.O. Box 1056
Santa Fe, NM 87504
Telephone (505) 982-2043
jamesbruc@aol.com

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STATEMENT OF THE CASE

Applicant, High Roller Wells LLC. Applicant seeks an order authorizing the injection of water for disposal into the Bell Canyon and Cherry Canyon members of the Delaware Mountain Group formation, Bell Canyon-Cherry Canyon SWD Pool (96802) in Eddy County, New Mexico in the following well:

Gossett SWD No. 1
313' FSL & 921' FEL (Unit P)
Section 33
T-23-S, R-28-E, NMPM
Eddy County, New Mexico

Applicant proposes to drill the well at the above location and utilize it for injection of produced water. Applicant's original C-108 Application specified the injection interval as being at depths of 2,500' to 5,000' subsurface. The original application proposed injection of fluids at a maximum daily rate of 30,000 BWPD. To address the concerns of area operators, Applicant now proposes to inject at depths of 2,600' to 3,340' and at maximum rates of 17,500 BWPD.

Mewbourne Oil Company brings this matter before the Commission on its Application for Hearing De Novo.

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Rick Johnston, Petroleum Engineer	20 minutes	11
Brian Wood (Permits West) Consultant	10 minutes	3

OPPONENT

WITNESSES

PROCEDURAL MATTERS

None.

Respectfully submitted,

MONTGOMERY & ANDREWS, P. A.

By: J. Scott Hall

J. Scott Hall, Esq.
Seth C. McMillan, Esq.
Post Office Box 2307
Santa Fe, New Mexico 87504-2307
(505) 982-3873
(505) 982-4289 fax
shall@montand.com
smcmillan@montand.com
Attorneys for High Roller Wells LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served to counsel of record by
electronic mail on May 12, 2016:

James Bruce, Esq.
P.O. Box 1056
Santa Fe, NM 87504
Telephone (505) 982-2043
jamesbruc@aol.com

Ocean Munds-Dry
COG Operating LLC
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000
(505) 428-0485 Facsimile
omundsdry@concho.com

J. Scott Hall
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