

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

RECEIVED
2011 MAY 25 P 4:11

IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:

OWL SWD OPERATING, LLC APPLICATION FOR
AUTHORIZATION TO INJECT

Case No. 15723

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Opponent as required by the Oil Conservation Division under 19.15.4.13 (B) NMAC.

APPEARANCES

APPLICANT

OWL SWD Operating, LLC

APPLICANT'S ATTORNEY

Dalva L. Moellenberg

OPPONENTS

New Mexico State Land Office

OPPONENT'S ATTORNEY

Katherine M. Moss

STATEMENT OF THE CASE

APPLICANT

Case No. 17723: Application of Owl SWD Operating, LLC for authorization to inject water for disposal into the Yates-Seven Rivers formation Lea County, New Mexico; Applicant seeks an order approving the use of the Bobcat SWD No. 1 for the injection of water into the Yates-Seven Rivers formation at the intervals and the pressures, volumes and rates detailed in its Application. Owl currently injects into the Maralo Sholes B Well No. 2 under the authority of Administrative Order SWD-1127 and intends for the Bobcat SWD No. 1 well to replace the Maralo Sholes B Well No. 2. Applicant proposes to drill this new well to a total depth of approximately 3,060 feet, for

injection of water into the Yates-Seven Rivers formation by open hole from 2,915 to 3060 feet. The well is located SW of Jal, NM.

OPPONENT NEW MEXICO STATE LAND OFFICE

The SLO is opposed to this replacement well being drilled as a SWD into the same zone as the Maralo Sholes Well No. 2, since the Tansill, Yates-Seven Rivers zones, as well as the Capitan Reef, contain protectable groundwater of the State of New Mexico in this area.

PROPOSED EVIDENCE

APPLICANT

The State Land Office has not received notice of witnesses or exhibits that will be presented by the Applicant.

STATE LAND OFFICE

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Anchor Holm	30 min	Approx. 6

OTHER OPPONENTS

The State Land Office has not received notice of witnesses or exhibits that will be presented by the other opponent.

PROCEDURAL MATTERS

No procedural matters have been identified that are to be resolved prior to the hearing.

Respectfully submitted,



Katherine M. Moss
Associate General Counsel
New Mexico State Land Office
P.O. Box 1148
Santa Fe, NM 87504-1148
(505) 827-5713

CERTIFICATE OF SERVICE

I hereby certify, that on this 25th day of May, 2017, a copy of the foregoing pleading was served via email upon the following counsel of record:

Dalva L. Moellenberg
Anthony J. Trujillo
Rikki-Lee Chavez
Gallagher and Kennedy, PA
1239 Paseo de Peralta
Santa Fe, New Mexico 87501
dln@gknet.com
ajt@gknet.com
rlc@gknet.com



Katherine M. Moss