

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

SEP 04 2018 PM 04:11

**APPLICATION OF DELAWARE ENERGY, LLC  
FOR APPROVAL OF A SALT WATER DISPOSAL  
WELL EDDY COUNTY, NEW MEXICO**

**CASE NO. 16375**

**FINLEY RESOURCES, INC.'S PRE-HEARING STATEMENT**

Finley Resources, Inc.'s ("Finley") provides this Pre-Hearing Statement as required by the rules of the Division.

**APPEARANCES**

**APPLICANT**

Delaware Energy, LLC

**ATTORNEY**

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**OPPONENT**

Finley Resources, Inc.

**ATTORNEY**

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**STATEMENT OF THE CASE**

Applicant Delaware Energy, LLC seeks an order authorizing injection for purposes of salt water disposal in the proposed Ensico Federal SWD No. 1 at a surface location 1095 feet from the

North line, 2090 feet from the West line (Unit B) in Section 35, Township 21 South, Range 27 East, NMPM, Eddy County, New Mexico. The target injection interval is the Devonian formation at a depth of 12,750-13,750 feet. The average disposal rate will be 5,000-10,000 BWPD with a maximum daily disposal rate of 17,500 BWPD. The average pressure will be 400-1,000 psi with a maximum psi of 2,550. Said well is located approximately 4.3 miles northeast of Carlsbad, New Mexico.

Finley Resources, Inc. is an interest owner in the subject acreage and target formation and opposes Delaware's application.

**PROPOSED EVIDENCE**

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBIT</u>
Unknown at this time		

OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Scott Ramsey	20 mins.	6

**PROCEDURAL MATTERS**

None at this time.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/ Seth C. McMillan

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*Attorneys for Finley Resources, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on September 4, 2018:

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/s/ Seth C. McMillan

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