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

APPLICATION OF SPUR ENERGY PARTNERS LLC FOR APPROVAL OF A PRESSURE MAINTENANCE PROJECT, EDDY COUNTY, NEW MEXICO.

**CASE NO. 23685** 

### PRE-HEARING STATEMENT

Spur Energy Partners LLC ("Spur") (OGRID No. 328947), the applicant in the above-referenced case, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

### **APPEARANCES**

#### **APPLICANT**

# **ATTORNEY**

Spur Energy Partners LLC

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Julia Broggi
Paula M. Vance
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#### **APPLICANT'S STATEMENT OF CASE**

Spur seeks an order approving a pressure maintenance project in the Yeso formation underlying a project area comprised of all of Section 36, Township 18 South, Range 25 East, and the W/2 W/2 of Section 31, Township 18 South, Range 26 East, NMPM, Eddy County, New Mexico (the "Project Area").

Spur Energy Partners LLC (OGRID No. 328947) is the operator of the following horizontal wells drilled and completed within the Project Area in the Penasco Draw; San Andres, Yeso Pool (Pool Code 50270):

- Pinto 36 State Com 1H (API No. 30-015-39781);
- Pinto 36 State Com 2H (API No. 30-015-39969);
- Pinto 36 State Com 4H (API No. 30-015-40058);
- Pinto 36 State Com 5H (API No. 30-015-39970);
- Pinto 36 State Com 6H (API No. 30-015-39971);
- Pinto 36 State Com 7H (API No. 30-015-39973);
- Pinto 36 State Com 8H (API No. 30-015-41667);
- Pinto 36 State 9H (API No. 30-015-42877);
- Pinto 36 State Com 27H (API No. 30-015-43399);
- Pinto 36 State 60H (API No. 30-015-49171);
- Pinto 36 State 70H (API No. 30-015-49172);
- Pinto 36 State 90H (API No. 30-015-49173); and
- Falabella 31 Fee 1H (API No. 30-015-40814).

Spur seeks approval to inject produced gas into its **Pinto 36 State Com #003H** well (API No. 30-015-39782) which is drilled and completed within the Project Area at a total vertical depth of approximately 2,311 feet to approximately 2,673 feet along the horizontal portion of this wellbore. Spur anticipates injection through this well will provide pressure maintenance support for its offsetting wells within the Project Area identified above.

Spur seeks authority to inject gas produced from the Penasco Draw; San Andres, Yeso Pool at a maximum surface injection pressure of 670 psi with an average surface injection pressure of approximately 470 psi. Spur proposes to inject produced gas at a maximum rate of 10 MMCF per day with an average daily injection rate of approximately 5 MMCF per day.

Approval of this pressure maintenance project will result in the production of substantially more hydrocarbons from the project area than would otherwise be produced, will prevent waste, and will not impair correlative rights.

### **APPLICANT'S PROPOSED EVIDENCE**

<u>WITNESS</u> Name and Expertise	ESTIMATED TIME	<b>EXHIBITS</b>
Oliver Seekins, Regulatory Expert (ALL Consulting LLC)	Approx. 30 minutes	Approx. 1
Reed Davis, Geology (ALL Consulting LLC)	Approx. 20 minutes	Approx. 1
George Waters, Petroleum Engineer	Approx. 15 minutes	Approx. 1

## **PROCEDURAL MATTERS**

Spur intends to present this case with live witnesses at the hearing on August 3, 2023.

Respectfully submitted,

**HOLLAND & HART LLP** 

By:\_\_

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QUESTIONS

Action 245326

#### **QUESTIONS**

Operator:	OGRID:	
Spur Energy Partners LLC	328947	
9655 Katy Freeway	Action Number:	
Houston, TX 77024	245326	
	Action Type:	
	[HEAR] Prehearing Statement (PREHEARING)	

#### QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witnesses	Not answered.	
Testimony time (in minutes)	Not answered.	