

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

**APPLICATION OF ARMSTRONG ENERGY  
CORPORATION FOR REINSTATEMENT OF  
AUTHORIZATION TO INJECT FOR  
WATERFLOOD OPERATIONS,  
LEA COUNTY, NEW MEXICO**

**CASE NO. 22080**

**PRE-HEARING STATEMENT**

Armstrong Energy Corporation (“Applicant”) submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Armstrong Energy Corporation

**ATTORNEYS**

Dana S. Hardy  
Michael Rodriguez  
P.O. Box 2068  
Santa Fe, NM 87504-2068  
Phone: (505) 982-4554  
Facsimile: (505) 982-8623  
dhardy@hinklelawfirm.com  
mrodriguez@hinklelawfirm.com

**INTERESTED PARTIES**

No other parties of record.

**ATTORNEYS**

**STATEMENT OF THE CASE**

Applicant applies for an order reinstating its injection authority for certain injection wells within its Trinity Burrus Abo Unit waterflood project (“Unit”). Order No. R-12496 approved creation of the Unit, which is comprised of the following 1,720 acres, more or less, of federal, state and fee lands located in Township 12 South, Range 38 East, NMPM, Lea County: Section 15 – SW/4SE/4; Section 22 – E/2 and E/2W/2; Section 23 – W/2 and W/2E/2; and Section 26 –

W/2W/2, NE/4NW/4, and SE/4SW/4. The unitized interval is 9,063' to 9,131'. Applicant has maintained waterflood operations within the Unit and proposes to reinstate its injection authority for the wells listed below:

<b>Well Name (API: 30-025-)</b>	<b>Location within T12S-R38E</b>	<b>Injection interval</b>
Trinity Burrus Abo Unit #004H (35817)	2310 FSL & 1210 FEL, UL I, Sec. 22	9050'- 9078'
Trinity Burrus Abo Unit #005 (36451)	2310 FNL & 1650 FWL, UL F, Sec 23	9056'- 9091'
Trinity Burrus Abo Unit #006 (35937)	330 FSL & 2310 FWL, UL N, Sec 22	9035'- 9087'
Trinity Burrus Abo Unit #011 (36038)	1650 FSL & 2310 FWL, UL K, Sec 22	9030'- 9080'
Trinity Burrus Abo Unit #013 (36018)	2310 FNL & 990 FEL, UL H, Sec 22	9052'- 9086'
Trinity Burrus Abo Unit #016 (36251)	1980 FSL & 660 FWL, UL L, Sec 23	9014'- 9062'
Trinity Burrus Abo Unit #018 (36450)	1650 FSL & 2200 FEL, UL J, Sec 23	9150'- 9184'
Trinity Burrus Abo Unit #021 (30106)	330 FSL & 1650 FWL, UL N, Sec 23	9110'- 9144'
Trinity Burrus Abo Unit #025 (36248)	2310 FSL & 330 FEL, UL I, Sec 27	9086'- 9128'
Trinity Burrus Abo Unit #026 (35985)	330 FNL & 2000 FEL, UL B, Sec 27	9036'- 9094'
Trinity Burrus Abo Unit #028 (37254)	2240 FSL & 2310 FWL, UL K, Sec 27	9078'- 9126'

Applicant proposes to inject water through a closed system through perforations at depths of 9,045' to 9,209' within the Wolfcamp formation. The proposed average injection rate is expected to be 100 psig, and the expected maximum injection pressure is 1,800 psig or as permitted by the Division. The proposed average injection rate is expected to be 500 barrels of water per day, and the maximum daily injection rate will be 1,000 barrels of water per day or as permitted by the Division. The Unit acreage is located approximately 25 miles northeast of Lovington, New Mexico.

**PROPOSED EVIDENCE**

<b>Witness</b>	<b>Occupation</b>	<b>Estimated Time</b>	<b>Exhibits</b>
Kevin Klein	Land Manager	Affidavit	Approx. 9
Kelsey Garner	Geologist	Affidavit	Approx. 4
Kyle Alpers	VP of Engineering	Affidavit	Approx. 2

**PROCEDURAL MATTERS**

Applicant will present this matter by affidavit if there is no opposition.

Respectfully submitted,

HINKLE SHANOR, LLP

*/s/ Dana S. Hardy*

---

Dana S. Hardy

Michael Rodriguez

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623

[dhardy@hinklelawfirm.com](mailto:dhardy@hinklelawfirm.com)

[mrodriguez@hinklelawfirm.com](mailto:mrodriguez@hinklelawfirm.com)

*Counsel for Armstrong Energy Corporation*

**District I**  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
 1000 Rio Brazos Rd., Aztec, NM 87410  
 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS

Action 38828

**QUESTIONS**

Operator: ARMSTRONG ENERGY CORPORATION P.O. Box 1973 Roswell, NM 882021973	OGRID: 167733
	Action Number: 38828
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witness	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>