# 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. 24042** 

### 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

Michael H. Feldewert Adam G. Rankin Paula M. Vance Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421

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#### **OTHER PARTIES**

## **APPLICANT'S STATEMENT OF CASE**

Spur seeks an order approving a pressure maintenance project within the Yeso Group underlying a project area comprised of portions of the E/2 E/2 of Section 13 and the SE/2 SE/4 of Section 12, Township 17 South, Range 29 East, and Section 18 and the S/2 S/2 of Section 7, Township 17 South, Range 30 East, NMPM, Eddy County, New Mexico.

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In this case, Spur seeks approval to inject produced gas into the Burch Keely Unit #566

(API No. 30-015-39870) at a total vertical depth of approximately 4,240 feet to approximately

4,540 feet. Spur anticipates injection through this well will provide pressure maintenance support

for its offsetting wells identified in the application, which are operated by Spur and drilled and

completed in the Yeso Group. The interval that will benefit from the proposed pressure

maintenance constitutes the Paddock member of the Yeso Group, being the stratigraphic

equivalent of 4,198 feet to the top of the Upper Blinebry at approximately 4,640 feet as identified

in the Burch Keely Unit #416 (API No. 30-015-37128). Spur seeks authority to inject produced

gas into the Burch Keely; Glorieta-Upper Yeso Pool (Pool Code 97918) at a maximum surface

injection pressure of 1,077 psi with an average surface injection pressure of approximately 700

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. The source of produced gas will be from

offsetting wells producing from the Glorieta-Upper Yeso Pool.

The project area for this pressure maintenance injection project will comprise the following

acreage in Eddy County:

Township 17 South, Range 29 East, NMPM

Section 13: E/2 E/2

Section 12: SE/4 SE/4

Township 17 South, Range 30 East, NMPM

Section 18: All

Section 7: S/2 S/2

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.

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## **APPLICANT'S PROPOSED EVIDENCE**

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

## **PROCEDURAL MATTERS**

Spur intends to present these cases through sworn statements at the hearing on December 7, 2023.

Respectfully submitted,

**HOLLAND & HART LLP** 

By:\_

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

QUESTIONS

Action 290038

#### **QUESTIONS**

Operator:	OGRID:
Spur Energy Partners LLC	328947
9655 Katy Freeway	Action Number:
Houston, TX 77024	290038
	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.	