

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

**APPLICATION OF MEWBOURNE OIL COMPANY
TO REVOKE OR MODIFY THE INJECTION
AUTHORITY GRANTED UNDER ORDER NO.
R-10139 FOR THE STATE MA COM NO. 1
OPERATED BY ENDEAVOR ENERGY
RESOURCES, LP, EDDY COUNTY, NEW MEXICO.**

CASE NO. 23042

PRE-HEARING STATEMENT

Endeavor Energy Resources, L.P. (“Endeavor”) provides this pre-hearing statement as required by the rules of the Division and the Pre-Hearing Order entered on October 6, 2022.

APPEARANCES

MEWBOURNE OIL COMPANY

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ENDEAVOR ENERGY RESOURCES, L.P.

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STATEMENT OF THE CASE

In this case, Mewbourne Oil Company (“Mewbourne”) seeks an order revoking or modifying the injection authority granted by Order R-10139, issued in June 1994 in Case No. 10968, which allows the disposal of produced water into the Bone Spring Formation via the State MA Com #1 well (API# 30-015-23709). Currently, Endeavor disposes of produced water from nine vertical wells into the First Bone Spring formation, as explained in more detail in the direct testimony filed concurrently. Since learning of Mewbourne’s concern, Endeavor has been investigating its options for alternative disposal. Endeavor estimates that it needs four to six months to complete its investigation and determine the options that are economically and technically feasible. Examples of potential options are outlined in the accompanying testimony.

If the Division is inclined to act on Mewbourne’s request at this time, Endeavor requests that the Division enter an order setting the deadline for ceasing disposal into the Bone Spring formation for July 1, 2023, and modifying Order No. R-10139 to allow disposal in an up-hole formation upon approval by the Division upon the requisite application by Endeavor. Proceeding in this manner would allow Endeavor to resolve Mewbourne’s concern without shutting in the producing wells, thereby preventing waste and protecting correlative rights.

MATERIAL FACTS

The parties do not dispute that Endeavor disposes of produced water into the First Bone Spring formation through the State MA Com #1 well, pursuant to Order No. R-10139. Further, the parties do not dispute that Mewbourne’s development plan includes the drilling of horizontal wells in the First Bone Spring formation in the vicinity of the State MA Com #1 well at some time in the future. However, the parties dispute at what time disposal into the First Bone Spring formation must cease.

PROPOSED EVIDENCE

APPLICANT MEWBOURNE:

WITNESSES	EST. TIME	EXHIBITS
TBD		

ENDEAVOR:

WITNESSES	EST. TIME	EXHIBITS
Bradley Bates, Petroleum Engineer	20 minutes	3-5

PROCEDURAL MATTERS

This case is set for hearing on December 15, 2022. Endeavor has proposed settlement on terms similar to the request that Endeavor makes herein and in the supporting direct testimony. If the parties reach agreement prior to hearing, this matter will be continued to a later docket and, upon cessation of disposal into the Bone Spring formation, this case will be dismissed.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail on December 8, 2022 to the following:

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
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QUESTIONS

Action 165618

QUESTIONS

Operator: ENDEAVOR ENERGY RESOURCES, LP 110 North Marienfeld Midland, TX 79701	OGRID: 190595
	Action Number: 165618
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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