

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

**APPLICATIONS OF PERMIAN OILFIELD
PARTNERS, LLC TO APPROVE SALT WATER
DISPOSAL WELL IN LEA COUNTY, NEW MEXICO. CASE NOS. 23807-23808**

CONSOLIDATED PRE-HEARING STATEMENT

Permian Oilfield Partners, LLC (“Permian”) submits this Consolidated Pre-Hearing Statement for the above-referenced cases pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Permian Oilfield Partners, LLC

ATTORNEY

Deana M. Bennett
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Yarithza Peña
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OTHER PARTIES

**MRC Permian Company and
Matador Production Company**

ATTORNEY

Michael H. Feldewert
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Paula M. Vance
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STATEMENT OF CASES

APPLICANT:

In Case No. 23807, Permian Oilfield Partners, LLC seeks an order approving disposal into the Silurian-Devonian formation through the Overdue Federal SWD Well #1 well at a surface location 602’ from the North line and 298’ from the East line, Unit A, Section 5, Township 20 South, Range 34 East, NMPM, Lea County, New Mexico for the purpose of operating a produced water disposal well. Applicant seeks authority to inject produced water into the Silurian-Devonian formation at a depth of approximately 14,675 feet to 15,844 feet. Applicant further requests that the Division approve a maximum daily injection rate for the well of 50,000 bbls per day. Said area is located approximately 18 miles west of Monument, New Mexico.

In Case No. 23808, Permian Oilfield Partners, LLC seeks an order approving disposal into the Silurian-Devonian formation through the Belated Federal SWD Well #1 well at a surface location 637’ from the South line and 208’ from the East line, Unit P, Section 27, Township 19 South, Range 34 East, NMPM, Lea County, New Mexico for the purpose of operating a produced water disposal well. Applicant seeks authority to inject produced water into the Silurian-Devonian formation at a depth of approximately 14,639 feet to 15,841 feet. Applicant further requests that the Division approve a maximum daily injection rate for the well of 50,000 bbls per day. Said area is located approximately 18 miles west of Monument, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

WITNESS	ESTIMATED TIME	EXHIBITS
Landman: Sean Puryear	Approx. 15 minutes	Approx. 10
Geologist: Gary Fisher	Approx. 15 minutes	Approx. 5

Permian will be submitting exhibits in advance of the hearing. Permian reserves the right to supplement its witness list or its exhibits to rebut any witnesses or exhibits MRC Permian Company and Matador Production Company (“Matador”) may advance.

PROCEDURAL ISSUES

These cases are currently set for a contested hearing on October 19, 2023. Matador has objected to the cases going to hearing by affidavit, which is immaterial for the reasons set forth in Permian’s Response to MRC Permian Company’s and Matador Production Company’s Objection to

Proceeding by Affidavit filed on October 10, 2023. To briefly summarize, POP filed these cases for the sole purpose of setting an adjudicatory hearing to resolve Matador's concerns, which is required by the Division's rules and is consistent with Division practice. Thus, there is no basis for Matador's objections to these cases going by affidavit because Permian does not intend to proceed by affidavit nor would proceeding by affidavit be appropriate given Matador's objections. Further, there is no reason to delay these hearings given that Matador has been on notice of Permian's intent to proceed to hearing and Matador has been aware of its basis for protesting Permian's applications since at least July 18, 2023.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P.A.

By: /s/ Deana M. Bennett

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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 this 12th day of October, 2023.

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

Action 275283

QUESTIONS

Operator: Permian Oilfield Partners, LLC PO Box 3329 Hobbs, NM 88241	OGRID: 328259
	Action Number: 275283
	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>