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

APPLICATION OF WATERBRIDGE STATELINE LLC TO APPROVE SALT WATER DISPOSAL WELL IN LEA COUNTY, NEW MEXICO.

CASE NO. 24568

WATERBRIDGE STATELINE, LLC'S PRE-HEARING STATEMENT

Waterbridge Stateline, LLC ("Waterbridge") submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

APPEARANCES

<u>APPLICANT</u> ATTORNEY

Waterbridge Stateline, LLC Deana M. Bennett Earl E. DeBrine, Jr.

Yarithza Peña

MODRALL, SPERLING, ROEHL,

HARRIS & SISK, P.A.

P. O. Box 2168

Albuquerque, New Mexico 87103-2168

(505) 848-1800

OTHER PARTIES ATTORNEY

None

STATEMENT OF CASE

APPLICANT:

In Case No. 24568, WaterBridge Stateline LLC seeks an order approving disposal into the Glorieta Sandstone formation through the FPNM SWD #1 well at a surface location 2532' from the North line and 1545' from the East line, Unit G, Section 25, Township 26 South, Range 37 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 Glorieta Sandstone formation at a depth of approximately 5,350 feet to 5,725 feet. Applicant further requests that the Division approve a maximum daily injection rate for the well of 20,000 bbls per day. Said area is located approximately 8.2 miles Southeast of Jal, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

WITNESS	ESTIMATED TIME	EXHIBITS
Regulatory Specialist: Oliver W. Seekins	Approx. 10 minutes	Approx. 5
Geophysicist: Reed Davis	Approx. 10 minutes	Approx. 5
Geologist: Thomas E. Tomastik	Approx. 10 minutes	Approx. 5

PROCEDURAL ISSUES

If there are no objections, Waterbridge intends to present this case by affidavit.

Respectfully submitted,

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

Bv:

Deana M. Bennett

Earl E. DeBrine, Jr.

Yarithza Peña

Post Office Box 2168

500 Fourth Street NW, Suite 1000

Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800

Deana.bennett@modrall.com

Earl.debrine@modrall.com

Yarithza.pena@modrall.com

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

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 356412

QUESTIONS

Operator:	OGRID:
WaterBridge Stateline LLC	330129
5555 San Felipe	Action Number:
Houston, TX 77056	356412
	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.	