

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

**APPLICATION OF RAZ OIL AND GAS L.L.C.
TO APPROVE SALT WATER DISPOSAL
WELL IN LEA COUNTY, NEW MEXICO.**

CASE NO. 25081

RAZ OIL AND GAS LLC's PRE-HEARING STATEMENT

Raz Oil and Gas LLC's ("Raz Oil") submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Raz Oil and Gas LLC

ATTORNEY

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

Mewbourne Oil Company

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
P.O. Box 2208
Santa Fe, NM 87504
(505) 988-4421

STATEMENT OF CASE**APPLICANT:**

In Case No. 25081, Raz Oil and Gas LLC seeks an order authorizing applicant to plug back the YO State SWD #1 well to the Delaware Mountain Group and authorizing applicant to inject produced water into the Delaware Mountain Group at a depth of approximate 5,540 feet to 6,930 feet. Applicant currently operates the YO State SWD #1 (API 30-025-38162), at a surface location 660' from the North line and 840' from the West line, Lot D, Section 15, Township 21 South, Range 35 East, NMPM, Lea County, New Mexico. 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 12.24 miles northwest of Eunice, New Mexico.

PROPOSED EVIDENCE**APPLICANT:**

WITNESS	ESTIMATED TIME	EXHIBITS
Landman: Joshua Ticknor	Approx. 10 minutes	Approx. 5
Geologist: Thomas E. Tomastik	Approx. 10 minutes	Approx. 5
Geophysicist: Reed Davis	Approx. 10 minutes	Approx. 3

PROCEDURAL ISSUES

Raz Oil intends to present this case by affidavit on February 13, 2025.

Respectfully submitted,

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

By: 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 counsel of record by electronic mail on February 6, 2025.

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Mewbourne Oil Company

A handwritten signature in blue ink that reads "Deana M. Bennett". The signature is written in a cursive style.

Deana M. Bennett

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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 429124

QUESTIONS

Operator: RAZ OIL AND GAS L.L.C. P.O. Box 1180 Eunice, NM 88231	OGRID: 370507
	Action Number: 429124
	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.