

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

**APPLICATION OF MESQUITE SWD, INC.
TO APPROVE PRODUCED WATER DISPOSAL
WELL IN EDDY COUNTY, NEW MEXICO**

CASE NO. 20472

MESQUITE SWD, INC.'S AMENDED PRE-HEARING STATEMENT

Mesquite SWD Inc. ("Mesquite") submits this amended Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Mesquite SWD, Inc.

APPLICANT'S ATTORNEY

Deana M. Bennett

OPPONENT

The New Mexico Oil Conservation Division

OPPONENT'S ATTORNEY

David K. Brooks
New Mexico Energy, Minerals
and Natural Resources
Department
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INTERESTED PARTY

Baker Ranch and Jesse T. Baker

ATTORNEY

James T. Roach
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STATEMENT OF CASES

APPLICANT:

In this case, Mesquite seeks an order approving disposal into the Siluro-Devonian formation through the Baker SWD Well No. 1 well at a surface location 330 feet from the South line and 309 feet from the West line (Unit M) of Section 1, Township 26 South, Range 31 East, NMPM, Eddy County, New Mexico for the purpose of operating a produced water disposal well. Mesquite seeks authority to inject produced water into the Siluro-Devonian formation through the open-hole interval from approximately 17,300' to 18,500'. Mesquite further seeks approval of the use of 7 inch tubing inside the surface and intermediate casings and 5 ½ inch tubing inside the liner and requests that the Division approve a maximum daily injection rate for the well of 40,000 bbls per day.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

Clay Wilson	Approx. 10 min	Approx. 5
Riley Neatherlin	Approx. 20 min.	Approx. 5
Dr. Kate Zeigler – Geologist	Approx. 30 min.	Approx. 11
Scott Wilson - Engineer	Approx. 30 min.	Approx. 11
Todd Reynolds-Geologist/Geophysicist	Approx. 30 min.	Approx. 11

PROCEDURAL ISSUES

The Oil Conservation Division is protesting this Application and has set it for hearing on May 31, 2019. The Oil Conservation Division has requested that that this case be consolidated with the other Mesquite cases set for hearing on May 31, 2019. Mesquite does not object to that request, and also requests that this case be consolidated with the two other Mesquite cases, Case Nos. 20313 and 20314 set for May 31, 2019.

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 May 23, 2019:

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