

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

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IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION COMMISSION  
FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF HIGH ROLLER WELLS LLC  
FOR AUTHORIZATION TO INJECT, EDDY COUNTY,  
NEW MEXICO.

Case 15278 (*de novo*)

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Mewbourne Oil Company ("Mewbourne") as required by the Oil Conservation Commission.

APPEARANCES

APPLICANT  
High Roller Wells LLC

APPLICANT'S ATTORNEY  
J. Scott Hall

OPPONENT  
Mewbourne Oil Company  
Suite 1020  
500 West Texas  
Midland, Texas 79701

OPPONENT'S ATTORNEY  
James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attention: Clayton Pearson  
(432) 682-3715

STATEMENT OF THE CASE

APPLICANT  
Applicant sought authorization to inject into the Bell Canyon and Cherry Canyon members of the Delaware Mountain Group in the proposed Gossett SWD Well No. 1, to be located in Unit P of Section 33 of Township 23 South, Range 28 East, NMPM. The Division approved the injection request, although it limited injection only into the Bell Canyon member.

OPPONENT  
Mewbourne opposes the application because of the following issues:

1 The Cherry Canyon and Brushy Canyon zones are proven to be productive near the proposed SWD well.

2. The proposed SWD well will not be able to keep injected water into the approved injection interval due to open hole intervals in offset wells, which provide a conduit connecting the injection interval with productive zones. This will lead to waste.

3 The Delaware Mountain Group has anomalously low frac gradients, and there are no frac barriers or impermeable strata to prevent migration of injection fluids outside of the proposed injection interval.

In addition, Mewbourne is the oil and gas lessee in Unit P of Section 33, and as owner of the dominant mineral estate does not want water injection into the formations in which it is lessee.

### PROPOSED EVIDENCE

#### APPLICANT

##### WITNESSES

##### EST. TIME

##### EXHIBITS

#### OPPONENT

##### WITNESSES

##### EST. TIME

##### EXHIBITS

Clayton Pearson  
(landman)

10 min.

Approx. 3

Nate Cless  
(geologist)

20 min.

Approx. 4

Travis Cude  
(engineer)

20 min.

Approx. 2

Drew Robison  
(engineer)

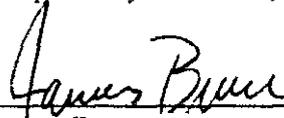
20 min.

Approx. 2

### PROCEDURAL MATTERS

-None-

Respectfully submitted,



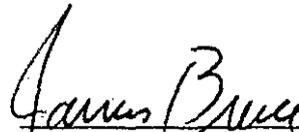
James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Mewbourne Oil Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 14<sup>th</sup> day of May, 2016 by e-mail:

J. Scott Hall  
*shall@montand.com*

  
James Bruce