



**MONTGOMERY
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LAW FIRM

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May 12, 2016

HAND-DELIVERED

Florene Davidson
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Application of High Roller Wells LLC – Case No. 15278 *De Novo*

Dear Ms. Davidson:

Enclosed please find for filing the original and one copy of Applicant's Pre-Hearing Statement. Also enclosed are six Exhibit Notebooks for the hearing on May 19, 2016 in the above matter.

Thank you.

Very truly yours,

J. Scott Hall

Enclosures

cc (w/encs.): Ocean Munds-Dry (via email and hand-delivery)
James Bruce, Esq. (via email, Pre-Hearing Statement only)

REPLY TO:

325 Paseo de Peralta
Santa Fe, New Mexico 87501
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**STATE OF NEW MEXICO
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES
OIL CONSERVATION COMMISSION**

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

Case No. 15278 *De Novo*

APPLICANT'S PRE-HEARING STATEMENT

High Roller Wells LLC, ("Applicant") provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

High Roller Wells LLC

APPLICANT'S ATTORNEY

J. Scott Hall, Esq.
Seth C. McMillan, Esq.
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OPPONENT/OTHER PARTIES

COG Operating

OPPONENT'S ATTORNEY

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Mewbourne Oil Company

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STATEMENT OF THE CASE

Applicant, High Roller Wells LLC. Applicant seeks an order authorizing the injection of water for disposal into the Bell Canyon and Cherry Canyon members of the Delaware Mountain Group formation, Bell Canyon-Cherry Canyon SWD Pool (96802) in Eddy County, New Mexico in the following well:

Gossett SWD No. 1
313' FSL & 921' FEL (Unit P)
Section 33
T-23-S, R-28-E, NMPM
Eddy County, New Mexico

Applicant proposes to drill the well at the above location and utilize it for injection of produced water. Applicant's original C-108 Application specified the injection interval as being at depths of 2,500' to 5,000' subsurface. The original application proposed injection of fluids at a maximum daily rate of 30,000 BWPD. To address the concerns of area operators, Applicant now proposes to inject at depths of 2,600' to 3,340' and at maximum rates of 17,500 BWPD.

Mewbourne Oil Company brings this matter before the Commission on its Application for Hearing De Novo.

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Rick Johnston, Petroleum Engineer	20 minutes	11
Brian Wood (Permits West) Consultant	10 minutes	3

OPPONENT

WITNESSES

PROCEDURAL MATTERS

None.

Respectfully submitted,

MONTGOMERY & ANDREWS, P. A.

By: J. Scott Hall

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Attorneys for High Roller Wells LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served to counsel of record by electronic mail on May 12, 2016:

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