

STATE OF NEW MEXICO RECEIVED OGD
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES
OIL CONSERVATION DIVISION 2011 MAR 23 P 3:12

APPLICATION OF MESQUITE SWD, INC.
TO AMEND APPROVALS FOR
SALT WATER DISPOSAL WELLS IN
LEA AND EDDY COUNTIES.

CASE NO. 15654

MESQUITE SWD, INC.'S PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Mesquite SWD, Inc.
P.O. Box 1479
Carlsbad, NM 88221

ATTORNEY

Earl E. DeBrine, Jr., Esq.
Jennifer L. Bradfute, Esq.
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INTERVENING PARTY:

Black River Water Management
Company, LLC
5400 LBJ Freeway, Suite 1500
Dallas, Texas 75240

Michael H. Feldewert
Jordan L. Kessler
Holland & Hart, LLP
P.O. Box 2208
Santa Fe, NM 87504-2208

STATEMENT OF CASE

APPLICANT:

Applicant in the above-styled cause seeks an order amending the size of tubing approved by the Division for certain Salt Water Disposal Wells approved by the Division to be drilled in Lea and Eddy Counties. All of the relevant Salt Water Disposal Wells are scheduled to be drilled for injection into the Devonian Formation. The wells and related administrative orders are as follows:

NMOCD Order Number	Order Date	Well Name	Legal Description
SWD-1667	2/23/2017	San Dunes SWD #2	Unit K, Sec. 8, T24S-R31E, Eddy County, N.M.
SWD-1642	8/5/2016	Scott B SWD #1	Unit N, Sec. 23, T24S-R28E, Eddy County, N.M.
SWD-1638	7/26/2016	VL SWD #1	Unit I, Sec. 14, T24S-R28E, Eddy County, N.M.
SWD-1558	6/26/2015	Station SWD #1	Unit F, Sec. 7, T24S-R32E, Lea County, N.M.
SWD-1636	7/15/2016	Cypress SWD #1	Unit L, Sec. 34, T23S, R29E, Eddy County, N.M.
SWD-1610	1/13/2016	Gnome East SWD #1	Unit D, Sec. 35, T23S, R30E, Eddy County, N.M.
SWD-1602	12/1/2015	Uber East SWD #1	Unit I, Sec. 24, T23S, R31E, Eddy County, N.M.
SWD-1600	11/20/2015	Uber North SWD #1	Unit B, Sec. 15, T23S, R31E, Eddy County, N.M.

The orders issued by the Division approving the drilling of each well states that injection will occur through 4 1/2 inch or smaller tubing. Mesquite seeks an amendment to each of these orders, allowing it to use 5 1/2 inch tubing. The tubing will be placed inside cemented casing.

INTERVENOR:

Intervenor is an operator of disposal wells in New Mexico and supports the use of 5 1/2 inch tubing for injection into the Devonian Formation.

PROPOSED EVIDENCE

APPLICANT:

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Riley Neatherlin, Engineer	Approx. 15	10
Steve Nave, Engineer/Fishing Expert	Approx. 15	4

INTERVENOR:

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Trent W. Green, Engineer	Approx. 30	5

Respectfully submitted,

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

By:  _____

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Attorneys for Mesquite SWD, Inc.

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 March 23, 2017.

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**MODRALL, SPERLING, ROEHL, HARRIS
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By: _____

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