

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

MAY 24 2018 PM02:42

**APPLICATION OF BLACK RIVER WATER MANAGEMENT
COMPANY, LLC FOR A SALT WATER DISPOSAL WELL AND
AUTHORIZATION TO INJECT THROUGH ITS PROPOSED
MALAGA SWD NO. 4 WELL, EDDY COUNTY, NEW MEXICO.**

CASE NO. 16130

PRE-HEARING STATEMENT

Black River Water Management Company, LLC, (“Black River”) the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

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

ATTORNEY

Michael H. Feldewert, Esq.
Adam G. Rankin, Esq.
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile

APPLICANT’S STATEMENT OF CASE

Black River seeks an order authorizing injection of produced water for disposal purposes through its proposed **Malaga SWD No. 4 well** (API No. 30-015-44514), with a surface location 1,489 feet from the North line and 490 feet from the West line (Unit E) of Section 11, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico. The maximum proposed daily injection rate will be approximately 40,000 barrels per day with an average daily injection rate of approximately 30,000 barrels per day. The proposed injection will occur within the Devonian

formation at a depth of approximately 14,230 feet to 15,103 feet deep. The maximum injection pressure will be 2,846 psi.

This application was initially filed administratively and is similar to the administrative application filed for the Malaga SWD No. 5 well (API No. 30-015-44571), recently approved as a disposal well in the same zone under SWD-1733 and located in adjacent Section 12. This matter for the Malaga SWD No. 4 was set for hearing following the filing of protests. All of the protests have been formally withdrawn except for the protest lodged by Carla Kay Nearhood Dickson, who resides in Arkansas. *See* Attached notice of protest.

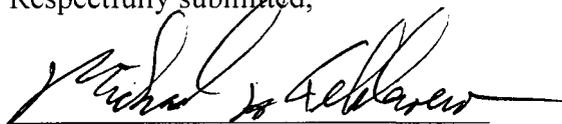
APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brooks Verschoyle, Landman	Approx. 10 minutes	Approx. 3
Bradley M. Robinson, Engineer	Approx. 20 minutes	Approx. 3

PROCEDURAL MATTERS

The protest filed by Carla Kay Nearhood Dickson is attached hereto. Notice of the hearing on this matter was provided to Ms. Dickson at the address provided on the attachment. In the event Ms. Dickson does not file a prehearing statement or otherwise enter an appearance, Black River will submit proof of notice to Ms. Dickson at the hearing and thereafter request that this application be approved administratively like the Malaga SWD No. 5 well (API No. 30-015-44571), which was recently approved as a disposal well in the same zone under SWD-1733 and is located in adjacent Section 12.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael H. Feldewert", written over a horizontal line.

Michael H. Feldewert

Julia Broggi

Adam G. Rankin

HOLLAND & HART LLP

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

mfeldewert@hollandhart.com

agrarkin@hollandhart.com

**ATTORNEYS FOR BLACK RIVER WATER
MANAGEMENT COMPANY, LLC**



April 24, 2018

MAY 02 2018 PM 03:12

I, Carla Kay Nearhood Dickson
object to the authorizing
injection of produced water
for disposal purposes of
Malaga SWD No. 4 well
(APD) No. 30-015-44514)

Carla Kay Nearhood Dickson

USPS TRACKING #



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

9590 9402 2319 6225 4723 46

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box®

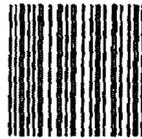
Carla Kay Neighborhood Dickson
405 N. Oaks Lane
Russellville, AR 72802

MAY 02 2018 PM 03:20

7013 3020 0000 5443 4606



1000



87505

U.S. POSTAGE
PAID
RUSSELLVILLE, AR
72801
APR 24, 18
AMOUNT
\$6.70
R2304M116129-08

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