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

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

APPLICATION OF SOUTHBOUND GAS COMPANY FOR APPROVAL OF A SALT WATER DISPOSAL WELL, LEA COUNTY, NEW MEXICO.

Case No. 16393

# PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

#### **APPEARANCES**

**APPLICANT** 

Southbound Gas Company

Suite 700

2720 North Stemmons Freeway

Dallas, Texas 75207

**APPLICANT'S ATTORNEY** 

James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attention:

Lucien J. Tujague

(214) 630-0088

**OPPONENT** 

**OPPONENT'S ATTORNEY** 

#### STATEMENT OF THE CASE

### APPLICANT

Applicant seeks an order approving disposal of produced water into the Pennsylvanian formation at depths of 6860-6883 feet subsurface in the Powell SWD Well No. 1, located 1980 feet from the north line and 1980 feet from the east line of Section 23, Township 2 South, Range 29 East, NMPM.

#### **OPPONENT**

## PROPOSED EVIDENCE

## **APPLICANT**

**WITNESSES** 

EST. TIME

**EXHIBITS** 

Stephen D. Smith

20 min.

Approx. 4

Lucien J. Tujague (potential witness)

# **OPPONENT**

WITNESSES

EST. TIME

**EXHIBITS** 

## PROCEDURAL MATTERS

Respectfully submitted,

James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attorney for Southbound Gas Company

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 40 10 day of August, 2018.

Patrick B. McMahon hsncpbm@leaco.net

James Bruce