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

APPLICATION OF BLACKBUCK RESOURCES, LLC FOR A SALT WATER DISPOSAL WELL, IN EDDY COUNTY, NEW MEXICO.

Case No. 20315

New Mexico State Land Office, 310 Old Santa Fe Trail, P.O. Box 1148, 87504-1148Santa Fe, NM

aantillon@slo.state.nm.us,

PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted by Blackbuck Resources, LLC, by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

| APPLICANT: | | |
|----------------------------------|---|--|
| | Blackbuck Resources, LLC | |
| ATTORNEY: | Ernest L. Padilla Padilla Law Firm, P.A. P.O. Box 2523 Santa Fe, New Mexico 87504 (505) 988-7577 padillalaw@qwestoffice.net | |
| OPPOSITION OR OTHER PARTY: | | |
| NGL Water Solutions Permian, LLC | Deana Bennett Modrall Sperling Roehl Harris & Sisk Bank of America Centre 500 Fourth Street, NW, Suite 1000 P.O. Box 2168 Albuquerque, NM 87103-2168 'Deana M. Bennett' <dmb@modrall.com< td=""></dmb@modrall.com<> | |
| Commissioner of Public Lands | Andrea Antillon | |

STATEMENT OF CASE

APPLICANT:

Applicant seeks an order proposing a salt water disposal well its Cresta SWD Fed 1, to drilled at a location 1137 FNL and 688 FWL, Unit D, Section 4, Township 24 South, Range 31 East, N.M.P.M., Eddy County, New Mexico. Applicant proposes to set a packer at 15,830 feet below the surface of the earth and then inject into the Devonian formation at depths between 15,850' through 17,240' open hole. The well will be located approximately 18 miles east of Malaga, New Mexico.

OPPOSITION OR OTHER PARTY:

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PROPOSED EVIDENCE

ECT TIME

EXITIDITE

<u>APPLICANT</u>

| WITNESSES | | EST. TIME | EXHIBITS |
|-----------------------|-----------------------|--------------------------------|--|
| Name | Title | Topic | Exhibits |
| Nathan Alleman | Permitting | SWD Application | C-108 |
| 20 min. | Specialist | | |
| , | Petroleum Engineer | Need for Disposal Capacity | Graph and Data Table with text. Research showing current and projected future produced water volumes in the area exceeding disposal volumes. |
| | | Induced Seismicity | Maps and data demonstrating distance from Cambrian and pre-Cambrian faults and seismic events. |
| | | Well Design | Wellbore diagram and discussion of mechanical integrity. |
| Tom Tomastik Senior C | | Injection Formation Geology | Geologic evaluation including summary of the injection formation and over- and underlying confining layers. |
| | Senior Geologist | Induced Seismicity | Maps and data demonstrating distance from Cambrian and pre-Cambrian faults and seismic events. |
| | | Injection Interference | Calculations and maps indicating no expected injection interference. |

OPPOSITION

WITNESSES EST. TIME EXHIBITS

PROCEDURAL MATTERS

Cases Nos. 20315 and 20316 will likely be consolidated for hearing.

PADILLA LAW FIRM, P.A.

/s/ ERNEST L. PADILLA
ERNEST L. PADILLA
Attorney for Blackbuck Resources, LLC
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Pre-Hearing Statement was served by e-mail to, deana.bennett@modrall.com, Deana M. Bennett, Modrall, Sperling, Roehl, Harris & Sick, P.A. PO Box 2168, Albuquerque, NM 87103-2168, aantillon@slo.state.nm.us, Andrea Antillon, New Mexico State Land Office, 310 Old Santa Fe Trail, P.O. Box 1148, 87504-1148Santa Fe, NM on this 28th day of February, 2019.

<u>/s/ERNEST L. PADILLA</u> ERNEST L. PADILLA