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

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

CASE NO. 20460

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

CASE NO. 20461

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

CASE NO. 20462

MESQUITE SWD, INC.'S PRE-HEARING STATEMENT

Mesquite SWD Inc. ("Mesquite") submits this Pre-Hearing Statement for the abovereferenced cases pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Blackbuck Resources, Inc.

APPLICANT'S ATTORNEY

Ernest L. Padilla

OPPONENT

Mesquite SWD, Inc.

XTO Energy, Inc.

OPPONENT'S ATTORNEY

Deana M. Bennett

Michael Felderwert Adam G. Rankin Julia Broggi Kaitlyn Luck

STATEMENT OF CASES

APPLICANT:

In Case No. 20460, Applicant seeks an order for a salt water disposal well in its **Camille SWD Fed 1**, to be drilled at a location 2,596 FSL and 1,471 FEL, Unit J, Section 17, Township 24 South, Range 31 East, N.M.P.M., Eddy County, New Mexico for injection into the Devonian-Silurian formations at depths between 16,225' through 17,300 open hole. The well will be located approximately 18 miles east of Malaga, New Mexico.

In Case No. 20461, Applicant seeks an order for a salt water disposal well in its **Ian SWD Fed 1**, to be drilled at a location 1,505 FNL and 2,444 FEL, Unit G, Section 18, Township 24 South, Range 31 East, N.M.P.M., Eddy County, New Mexico for injection into the Devonian and Silurian-Fusselman formations at depths between 16,250' through 17,915 open hole. The well will be located approximately 16 miles east of Malaga, New Mexico.

In Case No. 20462, Applicant seeks an order for a salt water disposal well in its **JJ SWD Fed 1**, to be drilled at a location 1,417 FSL and 677 FEL, Unit I, Section 18, Township 24 South, Range 32 East, N.M.P.M., Lea County, New Mexico for injection into the Devonian and Silurian-Fusselman formations at depths between 16,700' through 18,050 open hole. The well will be located approximately 22 miles east of Malaga, New Mexico.

OPPONENT:

Mesquite opposes these applications to protect its correlative rights and to present arguments to demonstrate that granting the application will not promote the prevention of waste.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

See Applicant's Pre-Hearing Statement.

OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	EXHIBITS
Riley Neatherlin	Approx. 10 min. per case	Approx. 5
Kate Zeigler – Geologist	Approx. 15 min. per case	Approx. 11

Scott Wilson - Engineer

Approx. 15 min. per case	Approx. 11
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Seismologist-TBD

Approx. 15 min. per case Approx. 7

Respectfully submitted,

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

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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 April 25, 2019:

Ernest L. Padilla Post Office Box 2523 Santa Fe, NM 87504 padillalaw@qwestoffice.net

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Attorneys for XTO Energy, Inc. in Case No. 20460

By: Neona M. Bennett

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