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

## APPLICATION OF VISTA DISPOSAL SOLUTIONS LLC, FOR A SALT WATER DISPOSAL WELL, IN LEA COUNTY, NEW MEXICO.

Case No. 20801

APPLICATION OF VISTA DISPOSAL SOLUTIONS, LLC FOR A SALT WATER DISPOSAL WELL, IN LEA COUNTY, NEW MEXICO.	
	Case No. 20802
APPLICATION OF VISTA DISPOSAL SOLUTIONS, LLC FOR A SALT WATER DISPOSAL WELL, IN LEA COUNTY, NEW MEXICO.	
,	Case No. 20803
APPLICATION OF VISTA DISPOSAL SOLUTIONS, LLC FOR A SALT WATER DISPOSAL WELL, IN LEA COUNTY, NEW MEXICO.	
IN LEA COUNTT, NEW MEAICO.	Case No. 20804
APPLICATION OF VISTA DISPOSAL SOLUTIONS, LLC FOR A SALT WATER DISPOSAL WELL, IN LEA COUNTY, NEW MEXICO.	
	Case No. 20805
APPLICATION OF VISTA DISPOSAL SOLUTIONS, LLC FOR A SALT WATER DISPOSAL WELL, IN LEA COUNTY, NEW MEXICO.	
	Case No. 20806
APPLICATION OF VISTA DISPOSAL SOLUTIONS, LLC FOR A SALT WATER DISPOSAL WELL, IN LEA COUNTY, NEW MEXICO.	
	Case No. 20807
APPLICATION OF VISTA DISPOSAL SOLUTIONS, LLC FOR A SALT WATER DISPOSAL WELL, IN LEA COUNTY, NEW MEXICO.	

Case No. 20808

#### PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted by Vista Disposal Solutions, 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:**

ATTORNEY:

Vista Disposal Solutions, LLC

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

Solaris Water Midstream, LLC

James Bruce PO Box 1056 Santa Fe, NM 87504 505-982-2043 jamesbruc@aol.com

# STATEMENT OF CASE

## APPLICANT:

<u>Case No. 20801:</u> Applicant seeks an order for a salt water disposal well in its Charles Federal SWD#1, to be drilled at a location 1,368' FNL and 1,885' FWL, Unit F, Section 35, Township 25 South, Range 32 East, N.M.P.M., Lea County, New Mexico for injection into the Devonian-Silurian formations at depths between 17,475' through 18,770' open hole.

<u>Case No. 20802:</u> Applicant seeks an order for a salt water disposal well in its Douglas Federal SWD#1, to be drilled at a location 175' FNL and 367' FEL, Unit A, Section 24, Township 26 South, Range 32 East, N.M.P.M., Lea County, New Mexico for injection into the Devonian-Silurian formations at depths between 17,420' through 18,700' open hole.

<u>Case No. 20803:</u> Applicant seeks an order for a salt water disposal well in its Justin Federal SWD#1, to be drilled at a location 2,401' FNL and 194' FEL, Unit H, Section 25, Township 25 South, Range 34 East, N.M.P.M., Lea County, New Mexico for injection into the Devonian Silurian formation at depths between 18,120' through 19,300' open hole.

<u>Case No. 20804:</u> Applicant seeks an order for a salt water disposal well in its Karen Federal SWD#1, to be drilled at a location 2,334 'FSL and 2,416' FWL, Unit K, Section 5, Township 26 South, Range 34 East, N.M.P.M., Lea County, New Mexico for injection into the Devonian Silurian formation at depths between 17,800' through 19,000' open hole.

<u>Case No. 20805:</u> Applicant seeks an order for a salt water disposal well in its Katherine Federal SWD#1, to be drilled at a location 707' FNL and 1,992 FEL, Unit B, Section 24, Township 25 South, Range 32 East, N.M.P.M., Lea County, New Mexico for injection into the Devonian Silurian formation at depths between 17,720' through 19,000 open hole.

<u>Case No. 20806:</u> Applicant seeks an order for a salt water disposal well in its Kathy Federal SWD#1, to be drilled at a location 2,153' FNL and 612' FWL, Unit E, Section 03, Township 26 South, Range 34 East, N.M.P.M., Lea County, New Mexico for injection into the Devonian Silurian formation at depths between 17,900' through 19,100' open hole.

<u>Case No. 20807:</u> Applicant seeks an order for a salt water disposal well in its Muir Federal SWD#1, to be drilled at a location 1,556' FSL and 2,665' FWL, Unit K, Section 30, Township 26 South, Range 34 East, N.M.P.M., Lea County, New Mexico for injection into the Devonian Silurian formation at depths between 17,520' through 18,800' open hole.

<u>Case No. 20808:</u> Applicant seeks an order for a salt water disposal well in its Samford Federal SWD#1, to be drilled at a location 261' FSL and 70' FWL, Unit E, Section 34, Township 26 South, Range 33 East, N.M.P.M., Lea County, New Mexico for injection into the Devonian Silurian formation at depths between 17,700' through 18,900' open hole.

# **OPPOSITION OR OTHER PARTY:**

# PROPOSED EVIDENCE

# APPLICANT

WITNESSES EST. TIME		EXHIBITS	
Name	Title	Topic	Exhibits
Nathan Alleman 30 min.	Permitting Specialist	SWD Application	C-108
J. Daniel Arthur, P.E., SPEC 30 min.	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 30min.	Senior Geologist	Injection Formation Geology	Geologic evaluation including summary of the injection formation and over- and under-lying confining layers.
		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. 20801 through 20808 will be consolidated for hearing.

#### PADILLA LAW FIRM, P.A.

## /s/ ERNEST L. PADILLA

ERNEST L. PADILLA Attorney for Vista Disposal Solutions, LLC PO Box 2523 Santa Fe, New Mexico 87504 505-988-7577 padillalaw@qwestoffice.net

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Pre-Hearing Statement was served by e-mail to, <u>deana.bennett@modrall.com</u>, Deana M. Bennett, Modrall, Sperling, Roehl, Harris & Sick, P.A. PO Box 2168, Albuquerque, NM 87103-2168, James Bruce, <u>jamesbruc@aol.com</u>, on this 26<sup>th</sup> day of September, 2019.

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