

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

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

CASE NOS. 20802, 20806, 20807, 20808

**EOG RESOURCES, INC.'S
CONSOLIDATED PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by EOG Resources, Inc. ("EOG") (OGRID No. 7377) pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Vista Disposal Solutions, LLC

OPPONENT

EOG Resources, Inc.

ATTORNEY

[unknown at this time]

ATTORNEY

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OPPONENT'S STATEMENT OF CASE

In **Case No. 20802**, Vista seeks approval of a salt water disposal well in Section 24, Township 26 South, Range 32 East, NMPM, Lea County, New Mexico. EOG is a working interest owner in this acreage that will be adversely impacted if the proposed **Douglas Federal SWD #1** is approved at the proposed location. Vista has made no efforts to accommodate EOG's concerns regarding development in the area, nor has Vista shown that its injection would be impaired if the well is moved to a location acceptable to EOG. Vista's proposed location for this well will interfere with EOG's development plans for this acreage, impairing EOG's correlative rights and will cause waste.

In **Case No. 20806**, Vista seeks approval of a salt water disposal well in Section 3, Township 26 South, Range 34 East, NMPM, Lea County, New Mexico. EOG is a working interest owner in this acreage that will be adversely impacted if the proposed **Kathy Federal SWD #1** is approved at the proposed location. Vista has made no efforts to accommodate EOG's concerns regarding development in the area, nor has Vista shown that its injection would be impaired if the well is moved to a location acceptable to EOG. Vista's proposed location for this well will interfere with EOG's development plans for this acreage, impairing EOG's correlative rights and will cause waste.

In **Case No. 20807**, Vista seeks approval of a salt water disposal well in Section 30, Township 26 South, Range 34 East, NMPM, Lea County, New Mexico. EOG is a working interest owner in this acreage that will be adversely impacted if the proposed **Muir Federal SWD #1** is approved at the proposed location. Vista has made no efforts to accommodate EOG's concerns regarding development in the area, nor has Vista shown that its injection would be impaired if the well is moved to a location acceptable to EOG. Vista's proposed location for this well will

interfere with EOG's development plans for this acreage, impairing EOG's correlative rights and will cause waste.

In **Case No. 20808**, Vista seeks approval of a salt water disposal well in Section 34, Township 26 South, Range 33 East, NMPM, Lea County, New Mexico. EOG is a working interest owner in this acreage that will be adversely impacted if the proposed **Samford Federal SWD #1** is approved at the proposed location. Vista has made no efforts to accommodate EOG's concerns regarding development in the area, nor has Vista shown that its injection would be impaired if the well is moved to a location acceptable to EOG. Vista's proposed location for this well will interfere with EOG's development plans for this acreage, impairing EOG's correlative rights and will cause waste.

OPPONENT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Charles Bassett, Landman	Approx. 15	Approx. 6
Megan Cook, Geologist	Approx. 15	Approx. 4
Michael Trout, Engineer/Well Planner	Approx. 15	Approx. 4

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART LLP

By: 

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CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2019, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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