

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

**APPLICATION OF OVERFLOW ENERGY, LLC  
FOR APPROVAL OF SALT WATER DISPOSAL WELL,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 20964**

**PRE-HEARING STATEMENT**

OVERFLOW ENERGY, LLC (“Overflow”), provides this Pre-Hearing Statement as required by the rules of the Division.

**APPEARANCES**

**APPLICANT**

OVERFLOW ENERGY, LLC

APPLICANT’S ATTORNEYS:

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**OPPONENTS**

MARATHON OIL PERMIAN LLC

OPPONENT’S ATTORNEY:

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NGL WATER SOLUTIONS  
PERMIAN, LLC

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## STATEMENT OF THE CASE

In Case No. 20964, Applicant seeks an order from the Division approving drilling of a salt water disposal well and authorizing injecting water for disposal into the Devonian formation [SWD; Devonian (96101)], in Section 27, Township 22 South, Range 27 East, NMPM, Eddy County, New Mexico. Applicant proposes to drill the **Rita SWD 1 well** at a surface location 1876' FNL and 807' FWL of Section 27-T22S-R27E at a depth of 12,900 feet to 14,000 feet. Injection operations through the well will be conducted at an anticipated average daily injection pressure of 2,500 psi, and at a maximum of 2,580 psi. Applicant proposes injection of water at an average daily rate of approximately 20,000 bwpd and at a maximum daily rate of approximately 25,000 bwpd. The source of the injected fluids will be formation water from production wells that have been drilled and are scheduled to be drilled in the area. The well and lands will be located approximately 4 miles southeast of Carlsbad, New Mexico.

## PROPOSED EVIDENCE

### APPLICANT:

| WITNESSES                                 | EST. TIME    | EXHIBITS |
|---|--------------|----------|
| Lori Hearon – Vice President, Development | 15 – 30 min. | 1-3      |
| Brian Wood – SWD Permitting Expert        | 15 – 30 min. | 1-3      |
| Vinny Mahadevan – Engineer                | 30 – 45 min. | 5-7      |
| Michael Fraim – Geophysicist              | 30 – 45 min. | 5-7      |

**OPPONENT MARATHON OIL PERMIAN LLC:**

| WITNESSES | EST. TIME | EXHIBITS |
|-----------|-----------|----------|
| TBD       | TBD       | TBD      |

**OPPONENT NGL WATER SOLUTIONS PERMIAN, LLC:**

| WITNESSES | EST. TIME | EXHIBITS |
|-----------|-----------|----------|
| TBD       | TBD       | TBD      |

**PROCEDURAL MATTERS**

If the issues Opponents have are resolved prior to hearing, Overflow may present the case by affidavit.

Respectfully submitted,

**MONTGOMERY & ANDREWS, P.A.**

By: /s/Sharon T. Shaheen

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*Attorneys for Overflow Energy, LLC*

**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 December 5, 2019, as follows:

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/s/Sharon T. Shaheen