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

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF SAN MATEO STEBBINS WATER MANAGEMENT, LLC FOR APPROVAL OF A SALT WATER DISPOSAL WELL, EDDY COUNTY, NEW MEXICO.

Case No. 21056

### PRE-HEARING STATEMENT

This pre-hearing statement is submitted by San Mateo Stebbins Water Management, LLC as required by the Oil Conservation Division.

#### **APPEARANCES**

APPLICANT

San Mateo Stebbins Water Management, LLC

Suite 1500

5400 LBJ Freeway

Dallas, Texas 75240

Attention:

Tara Flume

(972) 629-2129

**OPPONENTS** 

NGL Water Solutions Permian, LLC

APPLICANT'S ATTORNEY

James Bruce

P.O. Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

**OPPONENTS' ATTORNEY** 

Deana M. Bennett

#### STATEMENT OF THE CASE

#### APPLICANT

Applicant seeks an order approving disposal of produced water into the Devonian formation at depths of approximately 13103 - 14083 feet subsurface into the Jim Pat SWD Well No. 4, to be located 3745 feet from the south line and 1716 feet from the west line (Lot 14) of Section 4, Township 21 South, Range 28 East, NMPM. The maximum injection rate will be 45000 BWPD and the maximum injection pressure will be 2620 psi.

#### **OPPONENTS**

#### PROPOSED EVIDENCE

## **APPLICANT**

|         | WITNESSES                             | EST. TIME | <b>EXHIBITS</b> |
|---------|---------------------------------------|-----------|-----------------|
|         | Brian Wood<br>(regulatory specialist) | 20 min.   | Approx. 2       |
|         | Sam Pryor<br>(landman)                | 15 min.   | Approx. 2       |
|         | Andy Juett (geologist)                | 25 min.   | Approx. 4       |
|         | Brad Robinson (engineer)              | 30 min.   | Approx. 6       |
| PONENTS |                                       |           |                 |

# **OPPONENTS**

<u>WITNESSES</u> <u>EST. TIME</u> <u>EXHIBITS</u>

#### PROCEDURAL MATTERS

If the case is not opposed applicant would submit notice materials and ask that it be referred back to the administrative docket.

Respectfully submitted,

James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attorney for San Mateo Stebbins Water Management, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this \_\_\_\_\_\_ day of February, 2020 by e-mail:

Deana Bennett dmb@modrall.com

James Bruce