

**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

AMENDED 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

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

OPPONENTS

NGL Water Solutions Permian, LLC

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

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Brian Wood (regulatory specialist)	20 min.	Approx. 2
Brooks Verschoyle (landman)	15 min.	Approx. 2
Ned Frost (geologist)	20 min.	Approx. 2
Brad Robinson (engineer)	20 min.	Approx. 2

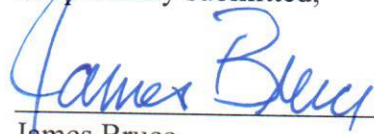
OPPONENTS

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

If the case is not opposed applicant would submit notice materials and ask that it be referred back to the administrative docket. In the alternative it may request permission to put on the case by affidavit.

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 17th day of February, 2020 by e-mail:

Deana Bennett
dmb@modrall.com


James Bruce