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

## APPLICATION OF AWR DISPOSAL LLC TO APPROVE SALT WATER DISPOSAL WELL IN LEA COUNTY, NEW MEXICO.

#### CASE NO. 21090 (TWIN SISTER)

## AWR DISPOSAL LLC'S PRE-HEARING STATEMENT

AWR Disposal LLC ("AWR") submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

## APPEARANCES

| APPLICANT                    | ATTORNEY                |
|------------------------------|-------------------------|
|                              |                         |
| AWR                          | Deana M. Bennett        |
|                              | P. O. Box 2168          |
|                              | Albuquerque, New Mexico |
|                              | 87103-2168              |
|                              | (505) 848-1800          |
| OPPONENT                     | ATTORNEY                |
| New Marias State Land Office | Andrea Antillan         |

Andrea Antillon a<u>antillon@slo.state.nm.us</u> 310 Old Santa Fe Trail P.O. Box 1148 Santa Fe, NM 87504-1148

New Mexico State Land Office

#### STATEMENT OF CASE

#### **APPLICANT**:

AWR seeks an order approving the Twin Sister SWD #1 well at a surface location 2170 feet from the North line and 183 feet from the West line of Section 29, Township 23 South, Range 34 East, NMPM, Lea County, New Mexico for the purpose

of operating a salt water disposal well. Applicant requests authorization to inject salt water into the into the Devonian-Silurian formation at a depth of 14,652'-16,318'. Applicant requests that the Division approve a maximum daily injection rate for the well of 50,000 bbls per day.

### **PROPOSED EVIDENCE**

#### **APPLICANT:**

#### **WITNESS**

#### ESTIMATED TIME

#### **EXHIBITS**

Neel Duncan– Operations

Approx. 25

Approx. 7

## **PROCEDURAL ISSUES**

AWR intends to put this case on by affidavits presented by Mr. Neel Duncan. Counsel for AWR has conferred with the New Mexico State Land Office's counsel who does not object to AWR proceeding by affidavits presented by Mr. Duncan.

Respectfully submitted,

# MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A.

By: Nema M. Bennet

Deana M. Bennett Post Office Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, New Mexico 87103-2168 Telephone: 505.848.1800 *Attorneys for Applicant* 

# **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 February 26, 2020:

New Mexico State Land Office Andrea Antillon a<u>antillon@slo.state.nm.us</u> 310 Old Santa Fe Trail P.O. Box 1148 Santa Fe, NM 87504-1148

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