

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

**APPLICATION OF LONGWOOD WATER
MANAGEMENT COMPANY, LLC FOR
AUTHORIZATION TO INJECT INTO THE
FLOWERS SWD No. 3 WELL FOR
PURPOSES OF DISPOSAL, EDDY COUNTY,
NEW MEXICO.**

CASE NO. 21129

PRE-HEARING STATEMENT

Longwood Water Management Company, LLC ("Longwood") (OGRID No. 328484), the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Longwood Water Management Company, LLC

ATTORNEY

Michael H. Feldewert, Esq.
Adam G. Rankin, Esq.
Julia Broggi, Esq.
Kaitlyn A. Luck, Esq.
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile

OTHER PARTIES

New Mexico State Land Office

Andrea Antillon, Esq.
New Mexico State Land Office
Post Office Box 1148
310 Old Santa Fe Trail
Santa Fe, NM 87504
(505)827-5752
(505) 827-4262 fax
aantillon@slo.state.nm.us

APPLICANT'S STATEMENT OF THE CASE

Longwood seeks authority to inject produced salt water for purposes of disposal through its proposed **Flowers SWD No. 3 Well** (API No. 30-015-pending), which will be located 1153 feet from the north line and 858 feet from the west line (Unit D), Section 21, Township 26 South, Range 31 East, NMPM, Eddy County, New Mexico. The proposed injection disposal interval would be within the Devonian formation [SWD; Devonian (Pool Code 96101)] through an open-hole completion between 16,927 feet and 17,871 feet below the ground. The estimated average disposal volume will be 50,000 barrels of water per day with a maximum anticipated volume of 60,000 barrels of water per day. The average injection pressure is expected to be approximately 2,500 psi with a maximum injection pressure of 3,385 psi.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Marshall Brooks Verschoyle, Landman	Approx. 15 minutes	Approx. 3
Dr. Edmund Locke Frost III, Geologist	Approx. 10 minutes	Approx. 3
Bradley M. Robinson, Reservoir Engineer	Approx. 10 minutes	Approx. 3

PROCEDURAL MATTERS

Applicant intends to present this case by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert

Adam G. Rankin

Julia Broggi

Kaitlyn A. Luck

Post Office Box 2208

Santa Fe, NM 87504

505-998-4421

505-983-6043 Facsimile

mfeldewert@hollandhart.com

agrankin@hollandhart.com

jbroggi@hollandhart.com

kaluck@hollandhart.com


**ATTORNEYS FOR LONGWOOD MANAGEMENT
COMPANY, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2020, I served a copy of the foregoing document to all counsel of record via Electronic Mail to:

Andrea Antillon, Esq.
Associate Counsel
New Mexico State Land Office
310 Old Santa Fe Trail
P.O. Box 1148
Santa Fe, NM 87504-1148
aaantillon@slo.state.nm.us

Attorney for the Commissioner of Public Lands, New Mexico State Land Office


Kaitlyn A. Luck