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

APPLICATION OF MESQUITE SWD, INC. TO AMEND APPROVALS FOR SALT WATER DISPOSAL WELLS IN LEA AND EDDY COUNTIES.



BLACK RIVER'S NOTICE OF INTERVENTION AND PRE-HEARING STATEMENT

Black River Water Management Company, LLC, ("Black River") hereby serves notice of

intervention in this matter and files this pre-hearing statement pursuant to the rules of the Oil

Conservation Division.

INTERVENING PARTY

Black River Water Management Company, LLC 5400 LBJ Freeway, Suite 1500 Dallas, Texas 75240

ATTORNEY

Michael H. Feldewert, Esq. Jordan L. Kessler, Esq. Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile mfeldewert@hollandhart.com jlkessler@hollandhart.com

INTERVENOR'S STATEMENT OF CASE

The applicant in this matter, Mesquite SWD, Inc. ("Mesquite") seeks approval to utilize internally coated 5 1/2 inch or smaller tubing on eight approved disposal wells for injection of produced water into the Devonian Formation. Black River is an operator of disposals wells in New Mexico and supports the use of 5 1/2 inch tubing for injection into the Devonian Formation.

INTERVENOR'S PROPOSED EVIDENCE

WITNESS Name and Expertise

ESTIMATED TIME

EXHIBITS

Trent W. Green, Engineer

Approx. 30 minutes

Approx. 5

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART LLP

By:

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~And~

Dana R. Arnold Black River Water Management Company, LLC 5400 LBJ Freeway, Suite 1500 Dallas, TX 75205 972-371-5284 darnold@matadorresources.com

ATTORNEYS FOR BLACK RIVER MANAGEMENT COMPANY, LLC

WATER

CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2017, I served a copy of the foregoing document to the following via electronic mail to:

Earl E. DeBrine, Jr. Jennifer Bradfute Modrall, Sperling, Roehl, Harris & Sisk, PA Post Office Box 2168 Bank of America Centre 500 Fourth Street NW, Suite 1000 Albuquerque, NM 87103-2168 Tel: (505) 848-1800 Fax: (505) 848-9710 Email: edbrine@modrall.com Email: Jennifer.bradfute@modrall.com

ATTORNEY FOR APPLICANT

Michael H. Feldewert