

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

**APPLICATION OF JUDAH OIL, LLC
FOR AUTHORIZATION TO INJECT INTO
THE SHINNERY OAK FED SWD No. 2 WELL
FOR PURPOSES OF DISPOSAL, EDDY
COUNTY, NEW MEXICO.**

CASE NO. 20441

**APPLICATION OF JUDAH OIL, LLC
FOR AUTHORIZATION TO INJECT INTO
THE SHINNERY OAK SWD No. 3 WELL FOR
PURPOSES OF DISPOSAL, EDDY COUNTY,
NEW MEXICO.**

CASE NO. 20442

JUDAH OIL, LLC'S CONSOLIDATED PRE-HEARING STATEMENT

Judah Oil, LLC ("Judah") (OGRID No. 245872), the applicant in the above-referenced matters, submits this consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Percussion Petroleum Operating, LLC

ATTORNEY

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OTHER PARTIES

ATTORNEY

None

APPLICANT'S STATEMENT OF CASE

In Case No. 20441, Judah Oil proposes to convert the Bigg Eddy Unit No. 32 Well (API No. 30-015-20309), which is located 660 feet from the south line and 660 feet from the west line (Unit M), Section 15, Township 21 South, Range 28 East, NMPM, Eddy County, New Mexico, from plugged and abandoned status to a commercial water disposal well to be named Shinnery Oak Fed SWD No. 2 Well. 3. The proposed injection disposal interval would be within the Devonian formation through an open-hole completion between 13,260 feet and 14,250 feet below the ground. No fluids will be injected into the underlying Montoya formation. Disposal fluid would be produced salt water from producing oil and gas wells in the area. The estimated average disposal volume will be 18,000 barrels of water per day with a maximum anticipated volume of 20,000 barrels of water per day. The average injection pressure is expected to be approximately 2,000 psi with a maximum injection pressure of 2,652 psi.

In Case No. 20442, Judah Oil proposes to drill a new commercial salt water disposal well to be named Shinnery Oak SWD No. 3 Well (API No. 30-015-PENDING), which will be located 3,312 feet from the south line and 1,014 feet from the west line (Lot 13), Section 2, Township 21 South, Range 28 East, NMPM, Eddy County, New Mexico. The proposed injection disposal interval would be within the Devonian formation through an open-hole completion between 13,400 feet and 14,420 feet below the ground. No fluids will be injected into the underlying Montoya formation. Disposal fluid would be produced salt water from producing oil and gas wells in the area. The estimated average disposal volume will be 20,000 barrels of water per day with a

maximum anticipated volume of 25,000 barrels of water per day. The average injection pressure is expected to be approximately 1,600 psi with a maximum injection pressure of 2,680 psi.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
James B. Campanella, Manager Judah Oil, LLC	Approx. 20	Approx. 4
George Scott III, Geologist	Approx. 30	Approx. 6

PROCEDURAL MATTERS

Judah Oil requests that Case Nos. 20441 and 20442 be consolidated for purposes of hearing.

Respectfully submitted,

HOLLAND & HART LLP

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