

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

JUN 06 2019 PM02:11

**APPLICATION OF LONGWOOD WATER  
MANAGEMENT COMPANY, LLC FOR  
AUTHORIZATION TO INJECT INTO THE  
RANDY ALLEN FEDERAL SWD No. 1 WELL  
FOR PURPOSES OF DISPOSAL, EDDY  
COUNTY, NEW MEXICO.**

**CASE NO. 20484**

**PRE-HEARING STATEMENT**

Longwood Water Management Company, LLC ("Longwood"), 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**

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**APPLICANT'S STATEMENT OF CASE**

Longwood Water Management Company, LLC seeks authority to inject produced salt water for purposes of disposal through its proposed **Randy Allen Federal SWD No. 1 Well** (API No. 30-015-PENDING), which will be located 133 feet from the south line and 2,588 feet from the east line (Unit O), Section 12, Township 26 South, Range 31 East, NMPM, Eddy County, New Mexico. The proposed injection disposal interval would be within the Devonian formation through an open-hole completion between 16,883 feet and 17,863 feet below the

ground. The estimated average disposal volume will be 40,000 barrels of water per day with a maximum anticipated volume of 45,000 barrels of water per day. The average injection pressure is expected to be approximately 2,500 psi with a maximum injection pressure of 3,376 psi.

#### **APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Brooks Verschoyle, Landman	Approx. 15 minutes	Approx. 5
Ned Frost, Geologist	Approx. 10 minutes	Approx. 3
Brad Robinson, Reservoir Engineer	Approx. 10 minutes	Approx. 3

#### **PROCEDURAL MATTERS**

None at this time.

Respectfully submitted,

HOLLAND & HART LLP

By: 

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**ATTORNEYS FOR LONGWOOD WATER  
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