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

### IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

## APPLICATION OF AGUA SUCIA, LLC FOR A LEASE PRESSURE MAINTENANCE PROJECT IN THE DELAWARE FORMATION, EDDY COUNTY, NEW MEXICO.

Case No. 14,564

#### PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

### APPEARANCES

#### **APPLICANT**

Agua Sucia, LLC 14605 South Memorial Drive Bixby, Oklahoma 74008 APPLICANT'S ATTORNEY James Bruce P.O. Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043

Attention: Denis Schoenhofer

<u>OPPONENT</u>

OPPONENT'S ATTORNEY

### STATEMENT OF THE CASE

#### APPLICANT

Applicant seeks approval to institute a lease pressure maintenance project in its Wilson Federal Lease (Federal Lease LC 064756) by the injection of produced water into the Delaware formation at the approximate depths of 4232-4250 feet subsurface in the R.T. Wilson Fed. Well No. 1, located 1980 feet from the south line and 660 feet from the east line of Section 24, Township 26 South, Range 31 East, NMPM.

#### <u>OPPONENT</u>

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## PROPOSED EVIDENCE

## APPLICANT

a. 10 T

### WITNESSES

Jim Nicholson

(engineer)

# <u>EST. TIME</u>

## EXHIBITS

30 min.

Approx. 6

**OPPONENT** 

WITNESSES

# EST. TIME

# **EXHIBITS**

### **PROCEDURAL MATTERS**

Respectfully submitted,

James Bruce Post Office Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043

Attorney for Agua Sucia, LLC