

**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:**

CASE NO. 3406

2005 FEB 11 PM 11 52

**APPLICATION OF SEELY OIL COMPANY FOR  
AMENDMENT OF THE REMEDIAL CEMENTING  
REQUIREMENTS OF DIVISION ORDER NO. R-  
11929 WHICH APPROVED WATERFLOOD  
OPERATIONS IN THE EK PENROSE SAND UNIT,  
LEA COUNTY, NEW MEXICO.**

**PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Seely Oil Company  
Attn: Clarence W. Stumhoffer  
Post Office Box 100416  
Fort Worth, Texas 76185  
(817) 946-8795

**ATTORNEY**

William F. Carr, Esq.  
Holland & Hart LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988.4421

**STATEMENT OF CASE**

**APPLICANT**

Applicant seeks an order amending Order No. R-11929 to eliminate the cementing requirements for the McElvain Federal Well No. 3 (API No. 30-025-28557) located in the

SW/4 SW/4 of Section 30, Township 18 South, Range 34 East NMPM, Lea County, New Mexico. Said well is located approximately 14 miles southwest of Lovington, New Mexico

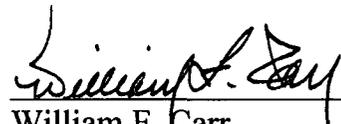
**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (Name and Expertise)	ESTIMATED TIME	EXHIBITS
David Henderson (Petroleum Engineer)	Approx. 15 Minutes	Approx. 6

**PROCEDURAL MATTERS**

Seely Oil Company has none at this time.

  
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William F. Carr  
Attorney for Seely Oil Company