

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

RECEIVED OGC
2019 JAN -2 P 11:22

APPLICATION OF OWL OIL AND GAS LLC
FOR APPROVAL OF A SALT WATER DISPOSAL
WELL, EDDY COUNTY, NEW MEXICO.

Case No. 15060

PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted by Endurance Resources, LLC, by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT:

Owl Oil & Gas LLC
467 Santa Road
PO Box 116
Hope, New Mexico 88250
(361) 549-6426

ATTORNEY:

James Bruce
PO Box 1056
Santa Fe, New Mexico 87504
505-982-2043

OPPOSITION OR OTHER PARTY:

Endurance Resources, LLC
P.O. Box 1466
Artesia, New Mexico 88211-1466

ATTORNEY:

Ernest L. Padilla
Padilla Law Firm, P.A.
PO Box 2523
Santa Fe, New Mexico 87504
505-988-7577
Endurance Resources, LLC

Gary W. Larson
Hinkle, Hensley, Shanor & Martin,
LLP
P.O. Box 2068
Santa Fe, NM 87504-2068
(505)982-4554

Yates Petroleum Corporation, et al
Artesia, NM

STATEMENT OF CASE

APPLICANT:

OPPOSITION OR OTHER PARTY:

Endurance Resources opposes the application because disposal of the produced water impairs Endurance Resources' operations and down-hole well equipment on its wells.

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
-----------	-----------	----------

OPPOSITION

WITNESSES	EST. TIME	EXHIBITS
Don Ritter, Engineer	15 min.	6 approx.
Randal Harris, Geologist	15 min.	Geologic data

PROCEDURAL MATTERS

None.

PADILLA LAW FIRM, P.A.



ERNEST L. PADILLA
Attorney for Endurance Resources, LLC
PO Box 2523
Santa Fe, New Mexico 87504
505-988-7577

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Pre-Hearing Statement was sent by electronic transmission to James Bruce, jamesbruc@aol.com, and to Gary W. Larson, glarson@hinklelawfirm.com on this 7th day of November, 2013.



ERNEST L. PADILLA