

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

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

**IN THE MATTER OF THE APPLICATION
OF COULTHURST MANAGEMENT &
INVESTMENT, LLC, FOR AUTHORIZATION
TO INJECT AS PART OF A PRESSURE
MAINTENANCE PROJECT, SANDOVAL
COUNTY, NEW MEXICO.**

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CASE NO. 14835

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Coulthurst Management & Investment, LLC
as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Coulthurst Management & Investment, LLC
5319 Broadway Terrace No. 303
Oakland, California 94618l

ATTORNEY

Michael H. Feldewert
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STATEMENT OF THE CASE

Coulthurst Management & Investment, LLC seeks an order authorizing it to inject
produced water into the Menefee formation, South San Luis-Mesaverde Pool, through the Erin
No. 2 well (API 30-043-20862), located 990 feet from the North line and 2310 feet from the
West line (Unit C) of Section 33, Township 18 North, Range 3 West, N.M.P.M., Sandoval

County, New Mexico. The proposed project area is approximately 520 acres in size, consisting of the W/2, N/2 NE/4, N/2 SE/4, SE/4 SE/4 of said Section.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Paul Thompson, Petroleum Engineer	Approx. 45 minutes	Approx. 5

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART, LLP



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