



MONTGOMERY
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2014 JUL 31 P 3:48

July 31, 2014

Ms. Jami Bailey, Director
New Mexico Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

Hand Delivered

Re: NMOCD Case No. 15180: Application of Parker Energy Support Services, Inc. for Authorization to Inject, Lea County, New Mexico.

Dear Ms. Bailey:

On behalf of Parker Support Services, Inc., enclosed is the pre-hearing statement for the hearing to take place on August 7, 2014.

Thank you.

Very truly yours,

J. Scott Hall

Enclosure a/s

590300

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

**IN THE MATTER OF THE APPLICATION OF
PARKER ENERGY SUPPORT SERVICES, INC.
FOR AUTHORIZATION TO INJECT, LEA
COUNTY, NEW MEXICO.**

Case No. 15180

PRE-HEARING STATEMENT

Parker Energy Support Services, Inc., ("Parker Energy"), provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

Parker Energy Support Services, Inc.

APPLICANT'S ATTORNEY

J. Scott Hall
MONTGOMERY & ANDREWS, P.A.
P.O. Box 2307
Santa Fe, NM 87504-2307
(505) 982-3873

OTHER PARTY(S)

Cameron Oil and Gas, Inc. and
Nordstrand Engineering, Inc.

OTHER PARTY'S ATTORNEY

Jim Bruce, Esq.
P.O. Box 1056
Santa Fe, NM 87504-1056
(505) 982-3873

New Mexico State Land Office

Kelly Brooks Smith, Esq.
New Mexico State Land Office
P.O. Box 1148
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STATEMENT OF THE CASE

Applicant seeks an order pursuant to 19.15.26.8 NMAC for an order authorizing the injection of water for disposal into the San Andres formation, San Andres SWD pool (96121), in Lea County, New Mexico. Applicant is the operator of the following well:

Harry Leonard NCT J No. 5 Well
API No. 30-025-38789
1,200' FNL & 990' FEL (Unit A)
Section 24
T-21-S, R-36-E, NMPM
Lea County, New Mexico

Applicant requests an Order approving the utilization of the Harry Leonard NCT J No. 5 well for the injection of water into the San Andres Formation at the intervals and at the pressures, volumes and rates indicated in the Application.

OTHER PARTIES

Written objections were received from Cameron Oil and Gas Company and from Nordstrand Engineering. After conferring with those parties, the Applicant has agreed to move the placement of the upper-most perforations at 4,182 feet, thereby resolving these objections. The New Mexico State Land Office submitted a written objection on July 16, 2014. The Applicant continues to confer with NMSLO staff.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

Brett Parker, Operator
Fred Ortiz, Petroleum Engineer

EST. TIME

20 minutes
30 minutes

EXHIBITS

4
4

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

None

Respectfully submitted,

MONTGOMERY & ANDREWS, P. A.

By: 

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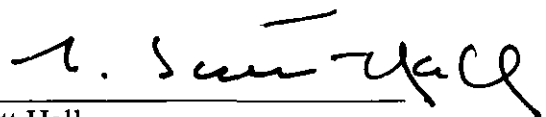
*Attorneys for Parker Energy Support
Services, Inc.*

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served to counsel of record by electronic mail this 31st day of July, 2014.

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