

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

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**APPLICATION OF LG&S OIL COMPANY, LLC
FOR A SALT WATER DISPOSAL WELL,
IN EDDY COUNTY, NEW MEXICO.**

Case No. 15345

PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted by LG&S Oil Company, 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:

LG&S Oil Company, LLC
Box 52
Lovington, NM 88260

ATTORNEY:

Ernest L. Padilla
Padilla Law Firm, P.A.
P.O. Box 2523
Santa Fe, NM 87504
Attorney for LG&S Oil Company, LLC
(505) 988-7577

OPPOSITION OR OTHER PARTY:

STATEMENT OF CASE

APPLICANT:

Applicant seeks an order proposing a salt water disposal its Keohane B Federal 3, located 1980' FNL and 1980' FWL, Unit F, Section 28, Township 18 South, Range 31 East, N.M.P.M., Eddy County, New Mexico. Applicant proposes to set a packer at 3200 feet below the surface of the earth and then inject into the Queen formation at the following depths of 3280' to 3570'.

OPPOSITION OR OTHER PARTY:

Devon Energy Prod. Co. LP

Michael Feldewert
Holland & Hart, LLP
PO Box 721
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(505) 988-4421

Concho Oil & Gas LLC
COG Operating LLC

Ocean Munds-Dry
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1048 Paseo de Peralta
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PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
Brian Woods (Consultant)	10-15 Minutes	C-108
John Maxey (Petroleum Engineer)	30 Minutes	Engineering & Pressure Data
Dennis Powers (Geologist)	20 Minutes	C-108 Geologic Maps & Cross-Sections Data
Ernest L. Padilla		Affidavit of Service

OPPOSITION

WITNESSES	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

PADILLA LAW FIRM, P.A.

/s/ ERNEST L. PADILLA
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was electronically transmitted on this 24th day of September, 2015 to the following:

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