

Davidson, Florene, EMNRD

From: jamesbruc@aol.com
Sent: Wednesday, June 8, 2016 5:45 PM
To: Davidson, Florene, EMNRD
Subject: Case 15487
Attachments: mack-phs-roswell basin.pdf

Attached for filing is Mack Energy's pre-hearing statement.

Jim

**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:**

**APPLICATION OF THE NEW MEXICO OIL
CONSERVATION DIVISION THROUGH THE
SUPERVISOR OF DISTRICT II FOR AN
EMERGENCY ORDER SUSPENDING CERTAIN
APPROVED APPLICATIONS FOR PERMIT TO
DRILL, AND FOR ADOPTION OF RULES FOR
DRILLING IN CERTAIN AREAS FOR THE
PROTECTION OF FRESH WATER, CHAVES
AND EDDY COUNTIES, NEW MEXICO.**

Case No. 15,487

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant Mack Energy Corporation as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Oil Conservation Division

OTHER PARTIES

Mack Energy Corporation
P.O. Box 960
Artesia, New Mexico 88211

Attention: Lee Livingston
(575) 748-1288

Devon Energy Production Company, L.P.

COG Operating LLC
OXY USA Inc.
Fasken Oil & Ranch, Ltd.

Yates Petroleum Corporation

APPLICANT'S ATTORNEY

David K. Brooks

OTHER PARTIES' ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043
jamesbruc@aol.com

James Bruce

Michael H. Feldewert & Jordan L. Kessler

Gary W. Larson

Pecos Valley Artesian Conservancy District

A.J. Olsen, Alvin F. Jones & Olivia Mitchell

Independent Petroleum Association
of New Mexico

Karin V. Foster

State Engineer

Pedro Seifert

STATEMENT OF THE CASE

APPLICANT

The Division seeks special drilling rules and casing programs for wells drilled on certain described lands along the Pecos River Valley in Chaves and Eddy Counties.

OTHER PARTIES

Mack Energy opposes the rules as proposed by the Division, for the following reasons:

1. The casing program proposed by the Division is not practical, and will make the drilling of wells both more complicated (potentially causing drilling problems) and more expensive.
2. There is no evidence of fresh water contamination caused by drilling.
3. Notwithstanding item 2, the expressed goal of preventing fresh water contamination can be better achieved with a simpler drilling and casing program than proposed by the Division, which will be set forth by Mack Energy Corporation at the hearing.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OTHER PARTIES

WITNESSES

EST. TIME

EXHIBITS

Jim Krogman
(Drilling supervisor for Mack Energy Corporation)

25 min. (direct)

Approx. 2

PROCEDURAL MATTERS

Respectfully submitted,

A handwritten signature in cursive script that reads "James Bruce". The signature is written in black ink and is positioned above a horizontal line.

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Mack Energy Corporation

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 8th day of June, 2016 by e-mail:

David K. Brooks
davidk.brooks@state.nm.us

Michael Feldewert
mfeldewert@hollandhart.com

Jordan L. Kessler
jlkessler@hollandhart.com

Al Olsen
ajolsen@h2olawyers.com

Alvin F. Jones
ajones@h2olawyers.com

Olivia R. Mitchell
omitchell@h2olawyers.com

Gary W. Larson
glarson@hinklelawfirm.com

Karin V. Foster
Karin@SWgovernmentaffairs.com

Pablo Seifert
Pablo.seifert@state.nm.us



James Bruce