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

APPLICATION OF MEWBOURNE OIL COMPANY TO REVOKE THE INJECTION
AUTHORITY GRANTED UNDER SWD-744 FOR THE WILLOW LAKE WELL NO. 1
OPERATED BY PYOTE WELL SERVICE, LLC, EDDY COUNTY, NEW MEXICO

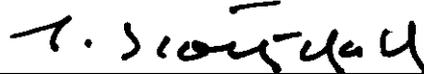
CASE NO. 15519

ENTRY OF APPEARANCE

Montgomery & Andrews, P.A. (J. Scott Hall), and enters its appearance as counsel for David Baker, Receiver by appointment of the U. S. District Court, Western District of Texas (Midland-Odessa Division), for the benefit of Pyote Water Solutions LLC and Pyote SWD II LLC. This Entry of Appearance is *provisional* and without prejudice to or waiver of any jurisdictional defenses, including failure to notify or join the real party or parties in interest.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: 

J. Scott Hall

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*Attorneys for David Baker, Receiver, for benefit of
Pyote Water Solutions LLC and Pyote SWD II LLC*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on August 15, 2016:

Michael H. Feldewert
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J. Scott Hall

2016 AUG 26 10 31 18

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CASE NO. 15519

PRE-HEARING STATEMENT

David Baker, Receiver for the benefit of Pyote Water Solutions LLC and Pyote SWD II LLC ("Receiver"), provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

OPPONENT

David Baker, Receiver, et al.

OPPONENT'S ATTORNEYS

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APPLICANT

MEWBOURNE OIL COMPANY

APPLICANT'S ATTORNEY

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STATEMENT OF THE CASE

Applicant Mewbourne Oil Company seeks an order revoking the injection authority granted by Administrative Order SWD-744 for the Willow Lake Well No. 1 (30-015-21499), a produced water disposal well, located 660 feet from the North line and 1980 feet from the West line (Unit C) in Section 22, Township 24 South, Range 28 East, N.M.P.M., Eddy County, New Mexico (the "Willow Lake SWD"). The Receiver opposes the relief sought by Mewbourne in its Application.

PROPOSED EVIDENCE

<u>OPPONENT:</u> Receiver, et al.	<u>EST. TIME</u>	<u>EXHIBITS</u>
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WITNESSES:

Rick Johnston, Petroleum Engineer	Approx. 45 minutes	Approx. 10
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<u>APPLICANT:</u> MEWBOURNE OIL COMPANY	<u>EST. TIME</u>	<u>EXHIBITS</u>
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WITNESSES:

Nathan Cless, Petroleum Geologist	Approx. 20 minutes	Approx. 4
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Tim Harrington, Petroleum Engineer	Approx. 35 minutes	Approx. 11
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PROCEDURAL MATTERS

Mewbourne failed to engage the real parties in interest in a timely manner. Additional time is needed for the Receiver to obtain operational data concerning the Willow Lake No. 1 SWD and to obtain the necessary technical advice to address and respond to the assertions made in Mewbourne's Application, or propose an appropriate solution. Correspondingly, the Receiver

has filed a motion to continue the hearing on Mewbourne's Application to the October 13, Examiner hearing docket. A case status conference is scheduled for August 26, 2016 at 9:00 a.m.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: J. Scott Hall

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of Pyote Water Solutions LLC Sand Pyote SWD II
LLC*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on August 25, 2016:

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