

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

**APPLICATION OF THE NEW MEXICO OIL CONSERVATION DIVISION  
COMPLIANCE AND ENFORCEMENT BUREAU FOR A COMPLIANCE ORDER  
AGAINST DAVID H. ARRINGTON OIL & GAS, INC., FOR WELLS OPERATED  
IN LEA, EDDY, CHAVES, AND SAN JUAN COUNTY, NEW MEXICO.**

**CASE NO. 15624**

**ARRINGTON'S PRE-HEARING STATEMENT**

David H. Arrington Oil & Gas, Inc. ("Arrington"), by and through counsel of record, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Oil Conservation Division  
Compliance and Enforcement  
Bureau

**APPLICANT'S ATTORNEY**

Keith W. Herrmann, Esq.  
Assistant General Counsel  
Energy, Minerals and Natural Resources  
Department  
1220 S. St. Francis Drive  
Santa Fe, NM 87505  
(505) 476-3463  
(505) 476-3462 Facsimile  
[Keith.Herrmann@state.nm.us](mailto:Keith.Herrmann@state.nm.us)

**RESPONDENT**

David H. Arrington  
Oil & Gas, Inc.

**RESPONDENT'S ATTORNEY**

Michael Feldewert, Esq.  
Jordan L. Kessler, Esq.  
Holland & Hart, LLP  
P.O. Box 2208  
Santa Fe, NM 87504  
(505) 988-4421  
(505) 983-6043 Facsimile  
[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)  
[jlkessler@hollandhart.com](mailto:jlkessler@hollandhart.com)

RECEIVED OGD  
2017 FEB - 9 P 3:20

## **ARRINGTON'S STATEMENT OF THE CASE**

Applicant seeks an order requiring Arrington to comply with NMAC 19.15.5.9, 19.15.8, and 19.15.25.8 by a date certain. The affected wells are listed in the Applicant's application. Arrington has been working with the Applicant on compliance issues and requests additional time to finalize bonding paperwork.

## **PROPOSED EVIDENCE**

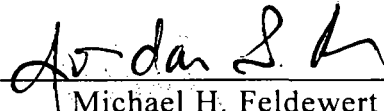
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Keith Bucy –Landman	Approx. 10	Approx. 5

## **PROCEDURAL MATTERS**

None at this time.

Respectfully,

Holland & Hart, LLP



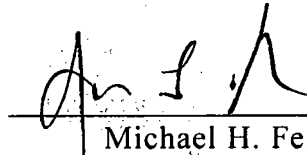
Michael H. Feldewert  
Jordan L. Kessler  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421  
(505) 983-6043 Facsimile

**ATTORNEYS FOR  
DAVID H. ARRINGTON OIL & GAS, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that on February 9, 2016, I served a copy of the foregoing pleading to the following counsel of record via electronic mail to:

Keith W. Herrmann  
Assistant General Counsel  
Energy, Minerals and Natural Resources Department  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
(505) 476-3463  
(505) 476-3462 Facsimile  
Keith.Herrmann@state.nm.us

A handwritten signature in black ink, appearing to read "M. H. Feldewert", is written over a horizontal line.

Michael H. Feldewert  
Jordan L. Kessler