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

2011 10 10 - 1

APPLICATION OF SMITH & MARRS INC FOR A PRESSURE MAINTENANCE PROJECT IN THE DELAWARE FORMATION, IN EDDY COUNTY, NEW MEXICO

Case No 15671

PRE-HEARING STATEMENT

This Pre hearing Statement is submitted by Smith and Marrs Inc by and through its undersigned counsel Ernest L Padilla PADILLA LAW FIRM PA as required by the Oil Conservation Division

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Smith & Marrs Inc

Ernest L Padilla Padilla Law Firm P A P O Box 2523 Santa Fe New Mexico 87504 (505) 988 7577 padillalaw@qwestoffice net

OPPOSITION OR OTHER PARTY

ATTORNEY

COG Operating LLC

William F Carr Ocean Munds Dry 1048 Paseo de Peralta Santa Fe NM 87501 (505) 780 8000 wcarr@concho com omundsdry@concho com

STATEMENT OF CASE

APPLICANT

Applicant seeks approval to institute a lease pressure maintenance project in its Superior State #1 located in Unit H Section 8 Township 25 South Range 30 East N M P M Eddy County New Mexico Applicant intends to inject produced water into the Delaware Sand formation through its Superior State #1 well located 1980 FNL and 660 FEL Unit H Section 8 Township 25 South Range 30 East N M P M Eddy County New Mexico at depths of 3736 to 3776 feet (perforated)

OPPOSITION OR OTHER PARTY

(Unknown)

PROPOSED EVIDENCE

APPLICANT

WITNESSES John Maxey (engineer)	EST TIME 30 min	EXHIBITS C 108 Isopac Map Geologic Cross Section Reservoir Data Water Flood Parameters Other Geologic Mapping
Ernest L Padılla		Affidavit of Service
OPPOSITION		
WITNESSES (Unknown)	EST TIME	EXHIBITS
PROCEDURAL MATTERS		
	Respectfully submitted	
OPPOSITION WITNESSES (Unknown)		Other Geologic Mappin Affidavit of Service EXHIBITS

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PADILLA LAW FIRM PA

<u>/s/ ERNEST L PADILLA</u> ERNEST L PADILLA

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was electronically transmitted on this 19th day of April to the following

William F Carr Ocean Munds Dry 1048 Paseo de Peralta Santa Fe NM 87501 (505) 780 8000 wcarr@concho com omundsdry@concho com

<u>/s/ ERNEST L PADILLA</u>