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 PECOS RIVER OPERATING, INC. FOR WELLS OPERATED IN CHAVES COUNTY, NEW MEXICO.

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CASE NO. 15751

PRE-HEARING STATEMENT

This pre-hearing statement in submitted by Pecos River Operating ("Pecos River") as required by the Oil Conservation Division Rule 19.15.4.13.B.

APPEARANCES

APPLICANT

Oil Conservation Division Compliance and Enforcement Bureau

ATTORNEY

Keith Herrmann Assistant General Counsel Energy, Minerals and Natural Resources Department 1220 S. St Francis Drive Santa Fe, NM 87505 (505) 476-3463

OPPONENT

Pecos River Operating PO Box 1755 Roswell, NM 88202

ATTORNEY

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APPLICANT'S STATEMENT OF CASE

OPPONENT'S STATEMENT OF CASE

Pecos River Operating is engaged in the process of obtaining well plugging bonds pursuant to NMAC 19.15.8 for the McKnight #2 Well and the Sun Diamond #1 Well. Pecos River has been working with the Applicant on bond issues and requests additional time to finalize bonding paperwork.

APPLICANT'S PROPOSED EVIDENCE

WITNESS

ESTIMATED TIME

EXHIBITS

Name and Expertise

OPPONENT'S PROPOSED EVIDENCE

WITNESS Name and Expertise **ESTIMATED TIME**

EXHIBITS

Tia Walker, President

Approx. 10 minutes

Approx. 5

PROCEDURAL MATTERS

Pecos River Operating respectfully requests a two week continuance in this matter.

Respectfully submitted,

HOLLAND & HART LLP

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ATTORNEYS FOR PECOS RIVER OPERATING

CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2017, I served a copy of the foregoing document to the following counsel of record via electronic mail to:

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