

**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:**

**IN THE MATTER OF THE APPLICATION OF SHELL EXPLORATION &
PRODUCTION CO. FOR APPROVAL OF A SALT WATER DISPOSAL WELL,
GUADALUPE COUNTY, NEW MEXICO.**

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CASE NO. 14616

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP as required by the rules of the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Shell Exploration & Production Co.
Attn: Michael Bergstrom
4582 South Ulster Street Parkway
Suite 1400
Denver, Colorado 80237

ATTORNEY

William F. Carr
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504
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STATEMENT OF CASE

APPLICANT

Shell Exploration & Production Co. seeks approval to utilize its Latigo Ranch 3-5 Well (API No. 30-019-20137) located 1831 feet from the South line and 1768 feet from the West line (Unit K) of Section 5, Township 10 North, Range 23 East, NMPM, to inject up to 8,640 barrels of water per day, at maximum pressure of 8,900 psi, into the Cuervo Hills Pennsylvanian formation, Webb Ranch Pool, in the perforated interval from 12,792 feet to 14,410 feet.

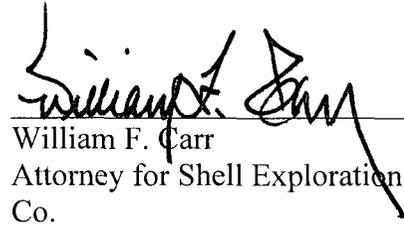
PROPOSED EVIDENCE

APPLICANT

| WITNESSES (Name and Expertise) | ESTIMATED TIME | EXHIBITS |
|--|----------------|-----------|
| Michael Bergestron Senior Regulatory Advisor | 20 minutes | Approx. 2 |
| Andrew James | 10 minutes | Approx. 2 |

PROCEDURAL MATTERS

Shell has none at this time.



William F. Carr
Attorney for Shell Exploration & Production
Co.