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:

CASE NO. 11358

APPLICATION OF NEARBURG EXPLORATION COMPANY TO TERMINATE INJECTION INTO TWO CERTAIN DISPOSAL WELLS BY RESCINDING DIVISION ORDER NO. R-7637 AND ADMINISTRATIVE ORDER SWD-336, EDDY COUNTY, NEW MEXICO

RECEIVED

1 1995

Oil Conservation Division

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Anadarko Petroleum Corporation as required by the Oil Conservation Division

APPEARANCES OF PARTIES

APPLICANT ATTORNEY

Nearburg Exploration Company J. Randy Turner

OPPOSITION ATTORNEY

Yates Petroleum Corporation Ernest L. Carroll

Anadarko Petroleum Corporation HINKLE, COX, EATON, COFFIELD 17001 North Chase Drive Houston, Texas 77060 Attn: Mark Sundland (713) 876-8477

Santa Fe, NM 87504-2068

(505) 982-4554

Post Office Box 2068

James Bruce

& HENSLEY, P.L.L.C., Ltd., Co.

Pre-hearing Statement

NMOCD Case No. 11358 Page 2

STATEMENT OF CASE

APPLICANT

OPPOSITION

The saltwater disposal operations of Anadarko and Yates have had no adverse effect on oil and gas production.

Pre-hearing Statement NMOCD Case No. 11358 Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES EST. TIME EXHIBITS

OPPOSITION

WITNESSES EST. TIME EXHIBITS

Mark Sundland 30 minutes Approx. 10 (Engineer)

PROCEDURAL MATTERS

HINKLE, COX, EATON, COFFIELD & HENSLEY, P.L.L.C., Ltd., Co.

James Bruce

Post Office Box 2068

Santa Fe, New Mexico 87504-2068

(505) 982-4554

Pre-hearing Statement NMOCD Case No. 11358 Page 4

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **Pre-Hearing Statement** was delivered by first-class mail, postage pre-paid, this day of September, 1995, to:

J. Randy Turner, Esq. TURNER & DAVIS Post Office Box 2796 Midland, Texas 79702

Ernest L. Carroll, Esq. LOSEE, CARSON, HAAS & CARROLL Post Office Box 1720 Artesia, New Mexico 88211-1720

James Bruce