

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

RECEIVED

IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
DIVISION FOR THE PURPOSE OF  
CONSIDERING THE APPLICATION OF  
WOODBINE PETROLEUM, INC. FOR  
AN EXCEPTION TO DIVISION ORDER  
NO. R-3221, EDDY COUNTY, NEW  
MEXICO

APR 1 1981  
OIL CONSERVATION DIVISION

CASE NO. 10282

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted on behalf of Woodbine Petroleum, Inc. as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

Applicant: Woodbine Petroleum, Inc.  
1445 Ross Avenue  
Dallas, Texas 75202  
(214) 855-6262

Contact Person: Don G. Shackelford  
Executive Vice President

Attorney: W. Perry Pearce  
Montgomery & Andrews, P.A.  
Post Office Box 2307  
Santa Fe, New Mexico 87504  
(505) 982-3873

APPLICANT'S STATEMENT OF THE CASE

Applicant in this case seeks an exception to Division Order No. R-3221, as amended, to permit the disposal of produced water into an unlined pit located in the SW/4SE/4 of Section 11, Township 19 South, Range 31 East, N.M.P.M, Eddy County, New Mexico.

APPLICANT'S PROPOSED EVIDENCE

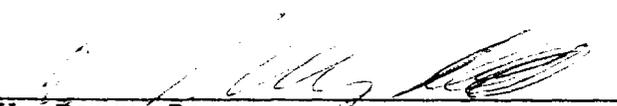
Applicant expects to call one witness and present 10 or fewer exhibits. The direct case should take 30 minutes or less.

PROCEDURAL MATTERS

Applicant is not aware of any procedural matters which need to be resolved prior to the hearing of this case.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By 

W. Perry Pearce  
Post Office Box 2307  
Santa Fe, New Mexico 87504-2307  
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Attorneys for Woodbine Petroleum, Inc.

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