

**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. 10407

IN THE MATTER OF THE APPLICATION  
OF GREAT LAKES CHEMICAL CORPORATION  
FOR AN EXCEPTION TO DIVISION ORDER  
NO. R-333-I AND THE REASSIGNMENT OF  
RETROACTIVE GAS ALLOWABLES,  
SAN JUAN COUNTY, NEW MEXICO.

RECEIVED  
JAN 1 1987  
OIL CONSERVATION DIVISION

**PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by William F. Carr, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Great Lakes Chemical Corporation  
c/o David Harlow \_\_\_\_\_  
Post Office Box 2200 \_\_\_\_\_  
West Lafayette, Indiana 47906 \_\_\_\_  
(317) 497-6100 \_\_\_\_\_

**ATTORNEY**

William F. Carr \_\_\_\_\_  
Campbell, Carr, Berge & Sheridan, P.A.  
Post Office Box 2208 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_  
(505) 988-4421 \_\_\_\_\_

**OPPOSITION OR OTHER PARTY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Telephone:

name, address, phone and  
contact person

**ATTORNEY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Telephone:

**STATEMENT OF CASE**

APPLICANT

Great Lakes Chemical Corporation, applicant, seeks the retroactive reassignment of gas allowables to the following six wells located in Township 27 North, Range 8 West, Blanco-Mesaverde Pool, said allowable for each well to be based on delinquent deliverability tests. Applicant further requests an exception to the provisions of Division Order No. R-333-I whereby each well would be exempt from any late penalties on allowables caused by failure to submit deliverability well test data in a specified time:

- Graham Well No. 1 (Unit A) Section 4
- Graham Well No. 1A (Unit P) Section 4
- Graham Well No. 3 (Unit J) Section 3
- Hammond Well No. 5 (Unit F) Section 35
- Hammond Well No. 55 (Unit B) Section 26
- Hammond Well No. 55A (Unit I) Section 26

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

**PROPOSED EVIDENCE**

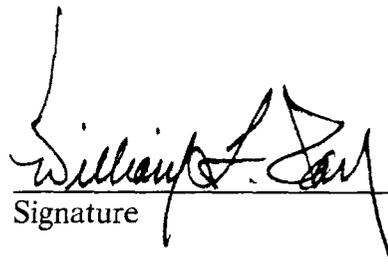
APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Richard L. Stamets, Geologist	25 Min.	Approximately 10

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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**PROCEDURAL MATTERS**

  
\_\_\_\_\_  
Signature

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OIL CONSERVATION DIVISION

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OIL CONSERVATION DIV.  
SANTA FE

Case No. 10407

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted on behalf of El Paso Natural Gas Company as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

Opponent: El Paso Natural Gas Company  
Post Office Box 1492  
El Paso, Texas 79978

Contact  
Person: John F. Nance, Esq.

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

OPPONENT'S STATEMENT OF OPPOSITION

El Paso Natural Gas Company is a party interested in this proceeding and is opposed to the granting of this application because reinstatement of gas allowables for the periods during which deliverability tests were delinquent is contrary to the requirements of Division Orders and is not in the best interest of the regulatory process.

*Don't get delinquent tests from E.P. & S.F.  
and then stop  
I just want to see  
all the data without that of the delinquent.*

OPPONENT'S PROPOSED EVIDENCE

El Paso Natural Gas Company expects to call one witness, Mr. H.L. Kendrick, who will present 10 or fewer exhibits. It is expected that the presentation of opponent's case will require approximately 30 minutes.

PROCEDURAL MATTERS

Opponent is not aware of any procedural matters which must be resolved prior to the hearing of this matter.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By   
W. Perry Pearce  
Post Office Box 2307  
Santa Fe, New Mexico 87504-2307  
(505) 982-3873

Attorneys for El Paso Natural  
Gas Company

CERTIFICATE OF SERVICE

I certify that I had delivered a copy of this Pre-Hearing Statement to William F. Carr, Esq. on January 20, 1992.

  
W. Perry Pearce

WPP/47

*has your done research to verify a report  
Stone to testimony as member of protected class.*