Law Offices of

R. E. RICHARDS, P.A.

R. E. RICHARDS

Set for april 24 Hearing (505) 393-7737

Hobbs, New Mexico 88241

January 18, 1985

; Case 8582

Richard L. Stamets, Director New Mexico Energy and Minerals Department Post Office Box 2088 Santa Fe, New Mexico 87501

OIL CONSERVATION DIVISION

JAN 2

Re: Application of Parabo, Inc.

Dear Dick:

Enclosed is Petition of Parabo, Inc., for amendment to Orders R-5516, R-5516-A, and R-5516-B. Per my telephone advice, I am delivering an endorsed copy of this Petition to Jerry Sexton.

Respectfully submitted,

R. E. RICHARDS

RER/p Enclosure

cc w/encl:

Jerry Sexton, Supervisor Energy and Minerals Department Post Office Box 1980 Hobbs, New Mexico 88241

Mr. Richard Brakey Parabo, Inc. 1901 Main Street Eunice, New Mexico 88231

STATE OF NEW MEXICO ENERGY AND MINERALS DEPARTMENT OIL CONSERVATION DIVISION

APPLICATION OF PARABO, INC., FOR AN ORDER AMENDING ORDERS R-5516, R-5516-A and R-5516-B

PETITION

COMES NOW, Parabo, Inc., by and through its attorneys, Law Offices of R. E. Richards, P.A., Post Office Box 761, Hobbs, New Mexico, 88241, and moves the Division for an Order amending Orders Numbers R-5516, R-5516-A and R-5516-B, and in support thereof states:

- 1. Applicant has been, under the above described Orders, operating a facility as described in those Orders whereby it commercially disposed of and does dispose of brinewater and other fluids generated in the drilling for and production of oil, gas, and other minerals.
- 2. That certain changes and amendments should be made in and to those Orders to more adequately reflect the Division's desires for the operation of said facility and to approve and authorize certain modifications because of desired and contemplated growth and expansion of said facility, and because of additional information gathered in the operation of said facility relating to certain freeboard requirements.

3. Rule 7 of Order R-5516-A dated March 18, 1981, should be amended to provide that as to Pits Two, Three, and Five, and Pits Six, and Pit Seven as authorized under Order R-5516-B that the total quantity of water in such Pits from both natural precipitation and previous disposal may reach a plane three feet below the level of the spillpoint of the triassic redbeds or the core dike surrounding said Pits; thus permitting disposal to levels as follows:

Pit Two: 3459 feet above sea level,

Pit Three: 3459 feet above sea level,

Pit Five: 3447 feet above sea level,

Pit Six: 3447 feet above sea level,

Pit Seven: 3440 feet above sea level.

WHEREFORE, premises considered, petitioner prays that the Division amend Orders R-5516, R-5516-A and R-5516-B, in conformity with the allegations herein and authorizing further and continued operations under said Orders as amended.

Respectfully submitted,

LAW OFFICES OF R. E. RICHARDS, P.A.

Post Office Box 761

Hobbs, New Mexico 88241

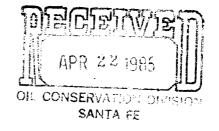
(505) 393-7737

Attorney for Petitioner

R. E. RICHARDS, P.A.

R. E. RICHARDS
WILLIAM C. FLEMING
OF COUNSEL

April 18, 1985



(505) 393-7737 414 North Turner P. O. Box 761 Hobbs, New Mexico 88241

Richard L. Stamets, Director
New Mexico Energy and Minerals Department
Post Office Box 2088
Santa Fe, New Mexico 87501

Supplemental and Amended Petition of Parabo, Inc.

Dear Dick:

Enclosed is the Supplemental and Amended Petition which we discussed.

Very truly yours,

LAW OFFICES OF R. E. RICHARDS, P. A.

R. E. RICHARDS

RER/da enclosure

STATE OF NEW MEXICO ENERGY AND MINERALS DEPARTMENT OIL CONSERVATION DIVISION

APPLICATION OF PARABO, INC., FOR AN ORDER AMENDING ORDERS R-5516, R-5516-A and R-5516-B.

SUPPLEMENTAL AND AMENDED PETITION

COMES NOW, Parabo, Inc., by and through its attorneys, the Law Offices of R. E. Richards, P. A., Post Office Box 761, Hobbs, New Mexico 88241, and moves the Division for an Order amending its original Petition as follows:

- 1. That paragraph 3 at the sixth line from the top of the second page, the word "three" should be deleted and the word "two" inserted.
- 2. That paragraph 3 at the indented material:
 Pit Five delete 3447 and insert 3448; Pit Six delete 3447
 and insert 3448; and Pit Seven delete 3440 and insert 3441.

Respectfully submitted,

LAW OFFICES OF R. E. RICHARDS, P.A. Post Office Box 761 (505) 3937737

Hobbs, NM 88241

Attorneys for Petitioner