MONT.

OF COUNSEL William R. Federici

J. Q. Seth (1883-1963) A. K. Montgomery (1903-1987) Frank Andrews (1914-1981)

Seth D. Montgomery Victor R. Ortega Jeffrey R. Brannen John B. Pound Gary R. Kilpatric Thomas W. Olson William C. Madison Walter J. Melendres Bruce Herr Robert P. Worcester James C. Compton John B. Draper Nancy Anderson King Alison K. Schuler Janet McL. McKay Jean-Nikole Wells Joseph E. Earnest Stephen S. Hamilton W. Perry Pearce Brad V. Coryell Michael H. Harbour Robert J. Mroz Sarah M. Singleton Jay R. Hone Charles W. N. Thompson, Jr. John M. Hickey Mack E. With Galen M. Buller

Katherine W. Hall Edmund H. Kendrick Helen C. Sturm Richard L. Puglisi Arturo Rodriguez Joan M. Waters James C. Murphy James R. Jurgens Ann M. Malonev Deborah J. Van Vleck Anne B. Hemenway Roger L. Prucino Deborah S. Dungan Helen L. Stirling Rosalise Olson William P. Slattery Kenneth B. Baca Daniel E. Gershon Michael R. Roybal Robert A. Bassett Paula G. Maynes Neils L. Thompson Susan Andrews Joseph E. Whitley David L. Skinner Elizabeth A. Glenn

MONTGOMERY & ANDREWS

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

March 21, 1988

HAND-DELIVERED

SANTA FE OFFICE 325 Paseo de Peralta Post Office Box 2307 Santa Fe. New Mexico 87504-2307

> Telephone (505) 982-3873 Telecopy (505) 982-4289

ALBUQUERQUE OFFICE Suite 500 7 Broadway Place 707 Broadway, N.E. Post Office Box 26927 Albuquerque, New Mexico 87125-6927

Telephone (505) 242-9677

LOS ALAMOS OFFICE Suite 120 901 18th Street Los Alamos, New Mexico 87544

Telephone (505) 662-0005

REPLY TO SANTA FE OFFICE

RECEIVED

MAR 2 1 1988

William J. LeMay, Director Oil Conservation Division State of New Mexico State Land Office Building Santa Fe, New Mexico 87501

JOHLERVATION DIVISION

Re: Application of Mobil Producing & Exploration U.S. for Saltwater Disposal Well, Section 27,

Township 18 S, Range 35 E

Dear Mr. LeMay:

Mobil Exploration & Producing U.S. Inc. currently has a case scheduled for hearing before the Division's hearing examiner at the regularly scheduled hearing of March 30, 1988. We have received information that Snyder Ranches will oppose the application for a saltwater disposal well at the above-referenced location.

The correspondence indicates that Snyder Ranches believes there are substantial legal questions involved in this matter which relate to both the Oil Conservation Division and the State Land Office.

In view of these concerns and the importance of saltwater disposal wells to New Mexico oil and gas operations, we request that this matter be set for hearing before the full New Mexico Oil Conservation Commission at its April hearing. Although we

William J. LeMay, Director March 21, 1988 Page 2

believe that this will continue the hearing of this matter for two or three weeks, we believe the parties are sufficiently concerned so that a de novo hearing would be requested whichever side prevailed at the examiner hearing level, and we believe that these important questions should ultimately be decided by the full Commission. I have discussed this request with Michael Comeau, representing Synder Ranches, and he will concur in this request.

Thank you for your attention to and consideration of this matter.

Sincerely,

W. Perry Pearc

WPP:mp:99

cc: J. W. Neal, Esquire
Michael R. Comeau, Esquire

Mr. Matthew E. Sweeney

Mr. T. L. Hill