

September 29, 1988

Energy and Minerals Department
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Re: Administrative Order No. SWD-346
Application of Corrine B. Grace
Ginger SWD Well No. 3
Township 26 South, Range 30 East, NMPM
Section 24: Unit H
Eddy County, New Mexico

Gentlemen:

Enclosed for filing, please find three copies of the Application of J. C. Williamson to Rescind Administrative Order No. SWD-346. Also enclosed is an extra copy of the Application which we would appreciate your returning to us in the enclosed stamped self-addressed envelope after inserting the docket number.

Thank you.

DICKERSON, FISK & VANDIVER



Chad Dickerson

CD:pvw
Enclosures

cc w/enclosure: Mr. Ernest L. Padilla
Mr. Ralph E. Williamson

BEFORE THE OIL CONSERVATION DIVISION
OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION OF :
J. C. WILLIAMSON TO RESCIND ADMINI- : CASE NO.
STRATIVE ORDER NO. SWD-346 :
_____ :

APPLICATION

COMES NOW J. C. Williamson, by his attorneys, and in support hereof, respectfully states:

1. J. C. Williamson is the operator of S/2 Section 13, Township 26 South, Range 30 East, N.M.P.M., Eddy County, New Mexico, which is within 1/2 mile of the proposed injection well under Administrative Order No. SWD-346.

2. Administrative Order No. SWD-346 was entered without notice to Applicant although he was entitled to notice under Oil Conservation Division Rule 701.

3. Administrative Order No. SWD-346 should be rescinded, and the application of Corrine B. Grace should be set for hearing before an examiner.

WHEREFORE, Applicant prays:

A. That Administrative Order No. SWD-346 be rescinded;

B. That the Application of Corrine B. Grace be set for hearing before an examiner and that notice of said hearing be given as required by law; and

C. For such other and further relief as may be just in the premises.

J. C. WILLIAMSON

By: 
Chad Dickerson

DICKERSON, FISK & VANDIVER
Seventh and Mahone, Suite E
Artesia, New Mexico 88210
(505) 746-9841

Attorneys for Applicant

PADILLA & SNYDER

ATTORNEYS AT LAW

200 W. MARCY, SUITE 212

P.O. BOX 2523

SANTA FE, NEW MEXICO 87504-2523

(505) 988-7577

ERNEST L. PADILLA
MARY JO SNYDER

FAX 988-7592
AREA CODE 505

RECEIVED

OCT 6 1988

OIL CONSERVATION DIVISION

October 6, 1988

HAND-DELIVERED

Mr. William J. Lemay, Director
Oil Conservation Division
310 Old Santa Fe Trail, Room 206
Santa Fe, New Mexico 87503

Through: David Catanach

Re: Administrative Order No. SWD-346; Application of
Corinne B. Grace, Ginger Salt Water Disposal Well
RSWD Well No. 3, Township 26 South, Range 30 East,
NMPM, Section 24, Unit H, Eddy County, New Mexico

Gentlemen:

We have received a copy of the application of J. C. Williamson to rescind the above-referenced administrative order because J. C. Williamson allegedly received no notice under Division Rule 701. In his application to rescind the above-referenced Order, Mr. Williamson alleges that he is the operator of the S/2 of Section 13, Township 26 South, Range 30, East, NMPM, Eddy County, New Mexico, which is within 1/2 miles of the proposed injection well.

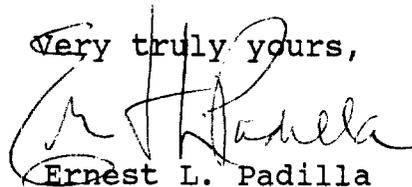
The application of Corinne B. Grace indicates that notice was sent to Sun Exploration and Production Company in Midland, Texas. Our search of the land records indicate that J. W. Williamson was not an owner or an operator of the S/2 of Section 13, and therefore the notice was sent to Sun, which is the owner of the lease. Our search also reveals that the federal lease records do not indicate that J. C. Williamson did not have on the date of certification a Designation of Operator on file with the Bureau of Land Management. In his application to rescind the order, Mr. Williamson has not attached any data which would indicate that indeed at the time of the application of Corinne B. Grace, or now, Mr. Williamson is operator of the S/2 of

Section 13. Our search indicated that Mr. Williamson was operator of the Sun Ex Unit as shown in the plat contained in the Grace application; the Sun Ex Unit has been terminated.

As an incidental matter, Corinne B. Grace has also made application for salt water disposal for the Zac Well No. 1, which will be heard by the Division on at its regularly scheduled hearing on October 26, 1988. Originally, the application was set for hearing on October 12, 1988, but we have requested a continuance. Should the Zac No. 1 application be approved, (which we have no reason to believe that it won't) the necessity of arguing about whether or not the application of J. C. Williamson should be considered, may become insignificant.

Accordingly, we request that the Division take no action with respect to the application of J. C. Williamson because J. C. Williamson has not filed with his application any documentation indicating that he is indeed the operator of the S/2 of Section 13 and in the alternative, we request that the Division take no action with regard to the application until after the hearing on the Zac No. 1 application.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Ernest L. Padilla".

Ernest L. Padilla

ELP:crk

cc: Corinne B. Grace
Chad Dickerson, Esq.