

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

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IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:

APPLICATION OF GEORGE ROSS RANCH, LLC
TO REVOKE ADMINISTRATIVE ORDER NO.
SWD-380, EDDY COUNTY, NEW MEXICO.

Case No. 14,888

AMENDED PRE-HEARING STATEMENT

This amended pre-hearing statement is submitted by Cimarex Energy Co. of Colorado ("Cimarex") as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

George Ross Ranch, LLC

APPLICANT'S ATTORNEY

W.T. Martin, Jr.

OPPONENT

Cimarex Energy Co. of Colorado
Suite 600
600 North Marienfeld
Midland, Texas 79701

OPPONENT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attention: Nash Dowdle
(432) 571-7857

STATEMENT OF THE CASE

APPLICANT

George Ross Ranch, LLC ("Ross Ranch") seeks an order revoking Administrative Order No. SWD-380, which approved the administrative application of Mallon Oil Company to inject produced water into the Amoco Fed. Well No. 1, located in the NE $\frac{1}{4}$ SE $\frac{1}{4}$ of Section 27, Township 26 South, Range 29 East, N.M.P.M.

OPPONENT

SWD-380 was issued in 1989. Notice of the administrative application was apparently not given to the surface owner (predecessor(s) to Ross Ranch). Cimarex assumed operation of the injection well a number of years after SWD-380 was issued.

Cimarex objects to the relief requested by applicant, for the following reasons:

1. The SWD application was technically correct and it was properly approved by the Division.
2. Cimarex is disposing only on-lease produced water into the injection well, which it is legally entitled to do.
3. If Ross Ranch has a claim against Cimarex (which Cimarex denies), District Court is the proper venue.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

Nash Dowdle
(landman)

15 min.

Approx. 5

Jeff Gotcher
(landman)

15 min.

Approx. 5

David Percy
(geologist)

15 min.

Approx. 3

Scott Gengler
(engineer)

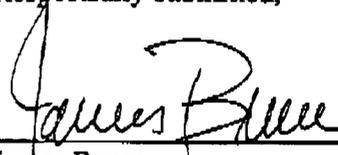
15 min.

Approx. 3

PROCEDURAL MATTERS

-None-

Respectfully submitted,



James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Cimarex Energy Co. of
Colorado

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 28th day of February, 2013 by facsimile transmission:

W.T. Martin, Jr.
Martin, Dugan & Martin
P.O. Box 2168
Carlsbad, New Mexico 88221
(505) 887-2136



James Bruce