

RECEIVED OCD
2016 APR -7 P 2:19

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

IN THE MATTER OF THE APPLICATION
OF GUARDIAN OPERATING
CORPORATION FOR AUTHORIZATION
TO INJECT, EDDY COUNTY,
NEW MEXICO.

Case No. 15483

PRE-HEARING STATEMENT

GUARDIAN OPERATING CORPORATION, ("Guardian") provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

GUARDIAN OPERATING
CORPORATION

GUARDIAN OPERATING CORPORATION'S
ATTORNEY

J. Scott Hall, Esq.
Seth C. McMillan, Esq.
MONTGOMERY & ANDREWS, P.A.
P.O. Box 2307
Santa Fe, NM 87504-2307
Tele (505) 982-3873
shall@montand.com
smcmillan@montand.com

MEWBOURNE OIL COMPANY

MEWBOURNE OIL COMPANY'S ATTORNEY

James Bruce
Post Office Box 1056
Santa Fe, NM 87504
jamesbruc@aol.com

RON MORALES, *PRO SE*

Ron Morales, *Pro se*
1111 North 8th
Artesia, NM 88210

STATEMENT OF THE CASE

Applicant seeks an order authorizing the injection of water for disposal into the Cherry Canyon member of the Delaware Mountain Group formation, Cherry Canyon SWD pool (97003), in Eddy County, New Mexico in the following well:

Kirkes SWD No. 1
API No. 30-015-23299
2080' FSL & 1773' FEL (Unit J)
Section 10
T-24-S, R-28-E, NMPM
Eddy County, New Mexico

PROPOSED EVIDENCE

APPLICANT'S WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

Mewbourne Oil Company owns no acreage in the vicinity of the proposed injection well and is not a party affected. There is no evidence that Mr. Morales owns a record title interest in the vicinity of the well. Both Mewbourne and Mr. Morales lack standing and their objections, if any, must be dismissed.

Respectfully submitted,

MONTGOMERY & ANDREWS, P. A.

By: J. Scott Hall
J. Scott Hall, Esq.
Seth C. McMillan, Esq.
Post Office Box 2307
Santa Fe, New Mexico 87504-2307
(505) 982-3873
(505) 982-4289 fax
shall@montand.com

smcmillan@montand.com

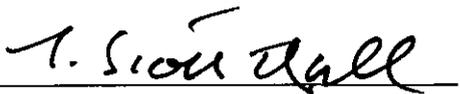
Attorneys for Guardian Operating Corporation

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on April 7, 2016:

James Bruce
Post Office Box 1056
Santa Fe, NM 87504
jamesbruc@aol.com

Ron Morales, *Pro se*
1111 North 8th
Artesia, NM 88210



J. Scott Hall