

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

IN THE MATTER OF THE APPLICATION OF
BOLD ENERGY, LP FOR OF A SALT WATER
DISPOSAL WELL, LEA COUNTY, NEW MEXICO

CASE NO. 14039

2007 NOV 26 PM 12:29

RECEIVED

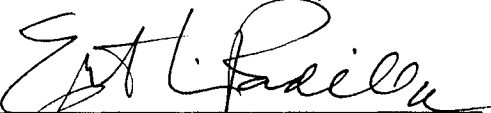
ENTRY OF APPEARANCE

COMES NOW, Ernest L. Padilla, PADILLA LAW FIRM, P.A. and enters his
appearance on behalf of BERT MADERA, MONTIE CAROL MADERA, and
MADERA FAMILY TRUST B in the above-captioned matter.

Respectfully submitted:

PADILLA LAW FIRM, P.A.

By:



Ernest L. Padilla
P.O. Box 2523
Santa Fe, New Mexico 87504
(505) 988-7577
FAX: 988-7592

CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing Entry of Appearance to be sent by
facsimile at 505-982-2151 and U.S. Postal Service to James G. Bruce, Esq.,
P.O. Box 1056, Santa Fe, NM 87504-1056 on this 26st day of November, 2007.



ERNEST L. PADILLA

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

26

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

APPLICATION OF BOLD ENERGY, LP
FOR A SALT WATER DISPOSAL WELL
LEA COUNTY, NEW MEXICO.

Case No. 14039

RECEIVED
2007 NOV 26 PM 12:29

PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted by BERT MADERA and MONTIE CAROL MADERA, by and through their undersigned counsel, Ernest L. Padilla, Padilla Law Firm, P.A. as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

ATTORNEY

APPLICANT:

BOLD ENERGY, LP

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

OPPOSITON OR OTHER PARTY:

BERT and MONTIE CAROL MADERA,
MADERA FAMILY TRUST B

Ernest L. Padilla
Padilla Law Firm, P.A.
Post Office Box 2523
Santa Fe, New Mexico 87504
(505) 988-7577

STATEMENT OF CASE

APPLICANT:

OPPOSITION OR OTHER PARTY:

Bert and Montie Carol Madera and Madera Family Trust B (Madera) oppose the application because the proposed salt water disposal well is located in the proximity of Madera's only fresh water source servicing that portion of Madera's ranch. Madera requests that the applicant drill monitor wells which will alert the applicant and Madera that the integrity of the injection well has failed or has otherwise been compromised. Applicant's and Madera's fresh water tests differ materially. Madera also has requested that annual fresh water well testing be conducted by the applicant. These are reasonable requests given the anticipated rates of injection into the injection well. Upon information and belief, the injection well will operate under considerable pressures and will be taking salt water from many sources, not limited to salt water produced from the federal oil and gas lease under which the well was original drilled. The primary source of salt water will be from applicant's Antelope Ridge oil recovery plant located in the vicinity of the proposed injection well.

Madera is informed that the applicant does not have authority from the Bureau of Land Management of the Department of Interior to inject salt water into the proposed injection well. Madera is further informed that the federal oil and gas lease on which the proposed injection well was originally drilled has expired by its own terms, thus applicant would not be authorized under the terms of the oil and gas lease to inject salt water produced from the lease.

Applicant has not obtained an easement from Madera, which owns the surface estate on which the injection well is located, to place a pipeline on the surface of the land or to otherwise use the surface of the land to operate the injection well.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

Unknown

OPPOSITION

WITNESSES

EST. TIME

EXHIBITS

Bert Madera

20 minutes

None

Roy Miller, P.E.

20 minutes

(1) Water Analysis
(2) Location map

PROCEDURAL MATTERS

(Please identify any procedural matters which need to be resolved prior to hearing.)

None

PADILLA LAW FIRM, P.A.



ERNEST L. PADILLA

P.O. Box 2523

Santa Fe, New Mexico 87504-2523

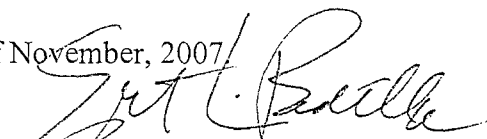
(505) 988-7577

CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of this Pre-Hearing Statement to be served by regular postal service upon

James G. Bruce, Esq.
Post Office Box 1056
Santa Fe, New Mexico 87504

and by facsimile at (505) 982-2151 this 26th day of November, 2007



ERNEST L. PADILLA