

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

APPLICATION OF THE NEW MEXICO OIL CONSERVATION DIVISION,
FOR A COMPLIANCE ORDER AGAINST AMERICO ENERGY RESOURCES,
LLC.

CASE NO. 14189

ENTRY OF APPEARANCE AND PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Oil Conservation Division

APPLICANT'S ATTORNEY

Sonny Swazo
Oil Conservation Division
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2008 OCT 23 PM 3 38

RECORDED

RESPONDENT

Americo Energy Resources, LLC
Oscar Nosrati
7575 San Felipe Ste 200
Houston, Texas 77063
(713) 984-9700

RESPONDENT'S ATTORNEY

Ocean Munds-Dry
Holland & Hart, LLP
P.O. Box 2208
Santa Fe, NM 87504
(505) 988-4421

STATEMENT OF THE CASE

Applicant seeks an order requiring Operator to comply with OCD Rule 19.15.3.101 and rule 19.15.4.201 by a date certain, and in event of Operator’s non-compliance, authorizing the Division to plug the wells and forfeit the financial assurance. The affected wells are listed in the Division’s application.

APPLICANT’S PROPOSED EVIDENCE

WITNESS:	ESTIMATED TIME:
Daniel Sanchez Enforcement and Compliance Manager	45 Minutes
Gerry Guye (by telephone) Compliance Officer, District II	45 Minutes

PROCEDURAL MATTERS

None.

STATEMENT OF CASE

RESPONDENT

Respondent has engaged the services of an environmental company to remediate the spills at the subject wells. Respondent respectfully requests penalties not be assessed at this time.

PROPOSED EVIDENCE

RESPONDENT

WITNESSES	ESTIMATED TIME	EXHIBITS
Oscar Nosrati Vice President	Approx. 15 minutes	Approx. 5

PROCEDURAL MATTERS

Americo has none at this time.

Ocean Munds-Dry
Ocean Munds-Dry
Attorney for Americo Energy Resources
LLC

CERTIFICATE OF SERVICE

I certify that on October 23, 2008 I served a copy of the foregoing document to the following by

- U.S. Mail, postage prepaid
 Hand Delivery
 Fax

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