

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

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

**IN THE MATTER OF THE APPLICATION OF SHELL EXPLORATION &
PRODUCTION CO. FOR APPROVAL OF A SALT WATER DISPOSAL WELL,
GUADALUPE COUNTY, NEW MEXICO.**

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CASE NO. 14617

PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

Shell Exploration & Production Co.
Attn: Michael Bergstrom
4582 South Ulster Street Parkway
Suite 1400
Denver, Colorado 80237

ATTORNEY

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Holland & Hart LLP
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STATEMENT OF CASE

APPLICANT

Shell Exploration & Production Co. seeks approval to utilize its Webb 3-23 Well (API No. 30-019-20135) located 1654 feet from the South line and 1646 feet from the West line (Unit K) of Section 23, Township 11 South, Range 23 East, NMPM, to inject up to 8,640 barrels of water per day, at maximum pressure of 8,900 psi, into the Cuervo Hills Pennsylvanian formation, Webb Ranch Pool, in the perforated interval from 10,602 feet to 13,078 feet.

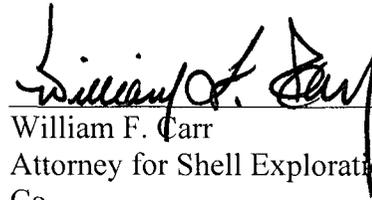
PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and Expertise)	ESTIMATED TIME	EXHIBITS
Michael Bergestron Senior Regulatory Advisor	20 minutes	Approx. 2
Andrew James	10 minutes	Approx. 2

PROCEDURAL MATTERS

Shell has none at this time.



William F. Carr
Attorney for Shell Exploration & Production
Co.