

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF PRIDE ENERGY COMPANY  
TO REOPEN ENERGY DEVELOPMENT CORPORATION'S  
CASE NO. 11470 FOR SALT WATER DISPOSAL AND  
DESIGNATION OF A PORTION OF THE MENEFEE  
MEMBER OF THE MESAVERDE FORMATION AS AN  
"EXEMPTED AQUIFER," SANDOVAL COUNTY,  
NEW MEXICO.

Case No. 11470 (Reopened)

AFFIDAVIT REGARDING NOTICE

STATE OF NEW MEXICO        )  
COUNTY OF SANTA FE        ) ss.

James Bruce, being duly sworn upon his oath, deposes and states:

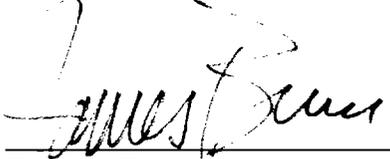
1. I am over the age of 18, and have personal knowledge of the matters set forth herein.

2. I am an attorney for Applicant.

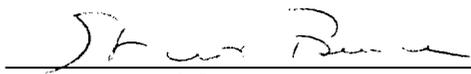
3. Applicant has conducted a good faith, diligent effort to find the names and correct addresses of the surface owners entitled to receive notice of the Application filed herein.

4. Notice of the Application was provided to the interest owner at its correct address by mailing it a copy of the Application, by certified mail. Copies of the notice letter and certified return receipt are attached hereto as Exhibit A.

5. Applicant has complied with the notice provisions of Division Rule 1207.

  
\_\_\_\_\_  
James Bruce

SUBSCRIBED AND SWORN TO before me this 15<sup>th</sup> day of May, 1997,  
by James Bruce.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:  
3/11/01

**JAMES BRUCE**  
ATTORNEY AT LAW

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SANTA FE, NEW MEXICO 87504

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April 8, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Eugene Johnson & Sons  
Route 2, Box 4  
Cuba, New Mexico 87013

Dear Sirs:

Pride Energy Company ("Pride") has filed an application at the New Mexico Oil Conservation Division to reopen Case No. 11470 in order to submit additional evidence regarding its request to inject produced water into the San Isidro (Shallow) Unit Well No. 7-11, located in the NE¼SW¼ of Section 7, Township 20 North, Range 2 West, NMPM, Sandoval County, New Mexico. A copy of the advertisement for the case is attached hereto. This matter was heard on March 6, 1997, but was continued to the hearing scheduled for 8:15 a.m. on Thursday, May 1, 1997 at the Division's offices at 2040 South Pacheco Street, Santa Fe, New Mexico. As an interested party, you have the right to enter an appearance and present evidence at the hearing (Pride does not plan on submitting additional testimony). Failure to appear at that time will preclude you from contesting this matter at a later date.

Very truly yours,



James Bruce

Attorney for Pride  
Energy Company



Case No. 11470 (Reopened)

Application of Pride Energy Company to Reopen Energy Development Corporation's Case No. 11470 for Salt Water Disposal and Designation of a Portion of the Menefee Member of the Mesaverde formation as an "Exempted Aquifer", Sandoval County, New Mexico.

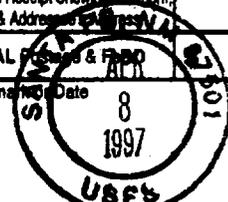
Applicant, being the successor operator to Energy Development Corporation within the San Isidro (Shallow) Unit, seeks to reopen Case No. 11470 which was heard by the Division on March 21 and May 2, 1996, to present additional technical evidence in its application for authority to inject produced water into the Menefee interval through perforations from 2,438 feet to 2,624 feet in its existing San Isidro (Shallow) Unit Well No. 7-11, located 2074 feet from the South line and 1650 feet from the West line (Unit K) of Section 7, Township 20 North, Range 2 West. Applicant also seeks to designate the Menefee interval underlying the W/2 E/2 and W/2 of Section 7 and the N/2 NW/4 of Section 18, Township 20 North, Range 2 West, and the E/2 E/2 of Section 12, Township 20 North, Range 3 West, as an "Exempted Aquifer" pursuant to Division Rule No. 701.E. and applicable Federal Underground Injection Control Program Rules and Regulations, as contained within the Code of Federal Regulations, 40 CFR Parts 145 and 146, thereby enabling the injection of produced water, for purpose of disposal, into said interval. Said area is located approximately 8 miles southwest of Cuba, New Mexico.

P 551 277 714

US Postal Service  
**Receipt for Certified Mail**  
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Post Office, State, & ZIP Code Cuba, New Mexico 87103	
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PS Form 3800, April 1995



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 The Return Receipt will show to whom the article was delivered and the date delivered.

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 Cuba, New Mexico 87103

**4a. Article Number:** P 551 277 714  
**4b. Service Type:**  
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**5. Received By: (Print Name)**  
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**6. Signature: (Addressee or Agent)**  
 Eugene Johnson & Sons

**7. Date of Delivery:** APR 10 1997

**8. Addressee's Address (Only if requested and fee is paid):**  
 Eugene Johnson & Sons  
 Route 2, Box 4  
 Cuba, New Mexico 87103

PS Form 3811, September 1994

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