

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

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OIL CONSERVATION DIVISION

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

**APPLICATION OF BP AMOCO PRODUCTION COMPANY
FOR PERMIT MODIFICATION AND AN EXEMPTION TO
CERTAIN PROVISIONS OF OIL CONSERVATION DIVISION
RULE 711, SAN JUAN COUNTY, NEW MEXICO.**

CASE NO. 12707

PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

BP Amoco Production Company
Attention: Colin Wasteney
URS Corporation
282 Delaware Avenue
Buffalo, NY 14202-1805
(716) 505-1010 ext. 1164

ATTORNEY

William F. Carr, Esq.
Holland & Hart LLP and Campbell & Carr
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988.4421

STATEMENT OF CASE

APPLICANT

Applicant seeks an order modifying OCD Rule 711 Permit Approval NM-02-0003 for the BP Crouch Mesa Centralized Waste Management Facility and an exemption from the provision of Oil Conservation Division Rule 711 to permits it to accept wastes generated outside New Mexico at this centralized surface waste management facility. Applicant accepts for remediation by land farming crude oil contaminated soils from pump stations operated by BP which are part of the former ARCO Pipe Line crude oil pipeline (Line 90) that runs from New Mexico to southern California. Applicant seeks authorization to accept crude oil contaminated soils from two pump stations on this pipeline located in the state of Arizona and one pump station on this line located in the state of Utah. The BP Crouch Mesa Centralized Waste Management Facility is located in the SW/4 SE/4 of Section 2, Township 29 North, Range 12 West, NMPM which is approximately 4 miles southeast of Farmington, New Mexico.

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and Expertise)

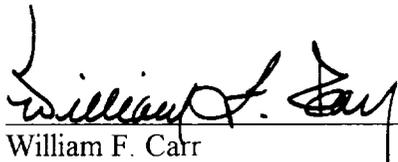
ESTIMATED TIME

EXHIBITS

NONE

PROCEDURAL MATTERS

BP Amoco Production Company pursuant to an agreement with the examiner will present their case by Affidavit.



William F. Carr

Attorney for BP Amoco Production Company