

JAMES E. TEMPLEMAN
C. BARRY CRUTCHFIELD

Law Offices of
TEMPLEMAN AND CRUTCHFIELD

A Professional Corporation
SECOND FLOOR, REED-McCROCKY BUILDING
LOVINGTON, NEW MEXICO 88260

OIL CONSERVATION DIVISION
RECEIVED

'90 AUG 6 AM 9

TELEPHONES
(505) 396-4927
(505) 396-4840
TELECOPIER
(505) 396-5481

August 3, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Oil Conservation Division
State of New Mexico
Energy and Minerals Department
Post Office Box 2088
State Land Office Building
Santa Fe, NM 87501

Oil Conservation Division
Post Office Box 1980
Hobbs, NM 88240

Re: In the Matter of the Application of Circle
Ridge Production, Inc.

Case 10088

To Whom It May Concern:

This firm represents E. P. Caudill, Incorporated. Please find enclosed Objections of Landowner To Secondary Recovery In Pipeline regarding the above captioned matter.

Thank you.

Sincerely,

TEMPLEMAN AND CRUTCHFIELD

By:

James E. Templeman
for C. Barry Crutchfield

CBC/bb
Encl/as stated

xc/ Mr. James Davis w/encl
Mr. Jerry Caudill w/encl

OIL CONSERVATION DIVISION
STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT

IN THE MATTER OF THE APPLICATION
OF CIRCLE RIDGE PRODUCTION, INC.

Case 10088

OBJECTIONS OF LANDOWNER
TO SECONDARY RECOVERY IN PIPELINE

COMES NOW E. P. Caudill, Incorporated, by and through its attorneys, Templeman and Crutchfield of Lovington, New Mexico, and states:

I.

That E. P. Caudill, Incorporated is the owner of land upon which said requested secondary recovery operation is sought for the transportation by pipeline and injection of production water and salt water by applicant. That E. P. Caudill, Incorporated objects to said authorization and hereby requests a hearing on the matter.

II.

That applicant Circle Ridge Production, Inc. is the operator of certain oil wells located upon property of E. P. Caudill, Incorporated. That said Circle Ridge Production, Inc. has failed and refused to abide by and comply with the requirements of the Oil Conservation Division and reasonable and prudent operations upon such property. That requested authorization herein will allow further destruction, waste, and unreasonable use by applicant of land of E. P. Caudill, Incorporated.

III.

That applicant has constructed an aboveground pipeline without

authorization nor permission across the surface rights of E. P. Caudill, Incorporated such that Circle Ridge Production, Inc. is a trespasser to the rights of E. P. Caudill, Incorporated. That in addition thereto, such constructed pipeline is of poor workmanship and is already leaking thereby damaging the surface of the property of the pipeline location.

WHEREFORE, the undersigned hereby objects to the Application for Secondary Recovery and requests a hearing on the matter as soon as possible.

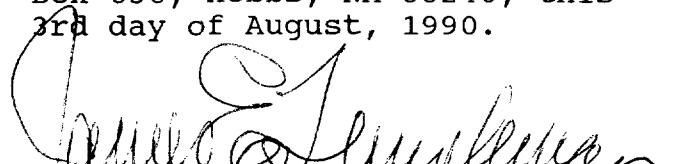
TEMPLEMAN AND CRUTCHFIELD
2nd Floor, Reed McCrory Building
Lovington, New Mexico 88260
(505) 396-4927

By:



C. BARRY CRUTCHFIELD
by James E. Templeman
Attorneys for E. P. Caudill,
Incorporated

I hereby certify that I mailed a copy of the foregoing instrument to Mr. James Davis, Post Office Box 636, Hobbs, NM 88240, this 3rd day of August, 1990.



C. BARRY CRUTCHFIELD
by James E. Templeman