

1 STATE OF NEW MEXICO  
2 ENERGY AND MINERALS DEPARTMENT  
3 OIL CONSERVATION DIVISION  
4 STATE LAND OFFICE BLDG.  
5 SANTA FE, NEW MEXICO

6 3 June 1987

7 EXAMINER HEARING

8 IN THE MATTER OF:

9 Application of Permian Corporation CASE  
10 for an exception to Division Order 9140  
11 No. R-3221, as amended, Eddy County,  
12 New Mexico.

13 BEFORE: David R. Catanach, Examiner  
14  
15  
16

17 TRANSCRIPT OF HEARING  
18  
19

20 A P P E A R A N C E S  
21

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I N D E X

JOE D. RAMEY

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1 MR. CATANACH: We'll call next  
2 Case 9140.

3 MR. TAYLOR: The application of  
4 Permian Corporation for an exception to Division Order No.  
5 R-3221, as amended, Eddy County, New Mexico.

6 MR. CATANACH: Are there ap-  
7 pearances in this case?

8 MR. SNEAD: Mr. Hearing Exam-  
9 iner, my name is Jim Snead. I'm with the Jones Law Firm, P.  
10 O. Box 2228, Santa Fe, New Mexico, Zip 87501, and I'm ap-  
11 pearing in behalf of the Applicant, Permian Corporation.

12 MR. CATANACH: Are there any  
13 other appearances in this case?

14 Will the witness please stand  
15 to be sworn in?

16  
17 (Witness sworn.)

18  
19 MR. SNEAD: Mr. Hearing Exam-  
20 iner, prior to the hearing we've handed out a series of ex-  
21 hibits, Numbers One through Five, I think you have them  
22 there with you, which will be referred to during the course  
23 of the -- of the hearing, and in conjunction with, particu-  
24 larly Exhibit Number Three, we will ask that the Commission  
25 take administrative notice of its Docket No. 7680 and the

1 hydrological study which was a part of that particular hear-  
2 ing, which is Exhibit Number Three is this proceeding.

3 MR. CATANACH: Mr. Snead, do  
4 you know the case number on that docket?

5 MR. SNEAD: It's Case No. 7680.

6 MR. CATANACH: Okay.

7 MR. SNEAD: Yes, sir.

8

9 JOE D. RAMEY,

10 being called as a witness and being duly sworn upon his  
11 oath, testified as follows, to-wit:

12

13 DIRECT EXAMINATION

14 BY MR. SNEAD:

15 Q Would you state your name, sir?

16 A Joe D. Ramey.

17 Q Where do you live, Mr. Ramey?

18 A I live in Hobbs, New Mexico.

19 Q And what's your business, Mr. Ramey?

20 A I'm an oil and gas consultant.

21 Q Have you previously testified before this  
22 Commission and been qualified as an expert?

23 A Yes, I have.

24 MR. SNEAD: We then submit,  
25 based on the record, Mr. Ramey as an expert to testify in

1 this matter.

2 MR. CATANACH: The witness is  
3 considered qualified.

4 Q Mr. Ramey, are you here today represen-  
5 ting Permian Corporation, the applicant in this case?

6 A Yes. I have been retained by Permian to  
7 handle this case.

8 Q Have you prior to the hearing caused to  
9 be prepared a series of exhibits that will accompany your  
10 testimony in this case?

11 A Yes, I have.

12 Q Would you for the record go through those  
13 exhibits and identify them, sir?

14 A Yes. Exhibit One is just a -- is a plat  
15 of the area showing the disposal area in the northwest quar-  
16 ter of Section 2.

17 Exhibit Two is schematic diagram of the  
18 equipment to be used in the oil and solid separation prior  
19 to disposing of the water into the lake.

20 Exhibit Three is a --

21 Q Excuse me, Mr. Ramey, Exhibit Two is a  
22 2-page exhibit, is it not --

23 A Yes, there's --

24 Q -- with a description of the --

25 A -- a description of the flow of the water

1 through the system.

2                   Exhibit Three is a hydrologic evaluation  
3 of the area.

4                   Exhibit Four is a report from the Artesia  
5 Office of the two disposal systems, similar disposal sys-  
6 tems, in the area and what they have disposed of in the last  
7 six months.

8                   And then Exhibit Five is a letter, a copy  
9 of the letter that I sent to the Commissioner of Public  
10 Lands and the surface lessee in Section 2.

11                Q           So that the proposed disposal site is lo-  
12 cated on State land?

13                A           Yes, it is.

14                Q           And you notified both the Commissioner  
15 and the surface rights lessee?

16                A           Yes, I have.

17                Q           Now, Mr. Ramey, if you would particular-  
18 ly, sir, refer to Exhibit Number One and I believe that  
19 could be taken in conjunction with a more detailed local  
20 map, which is shown on page six of Exhibit Three, and de-  
21 scribe to the Hearing Examiner what -- where this proposed  
22 disposal site is located.

23                A           Yes. On Exhibit One it is the northwest  
24 quarter of Section 2. It is outlined in red and as you can  
25 see, it's -- it's very close to State Highway 128. It will

1 only be necessary to build a road about 300 feet off of that  
2 highway to the disposal site.

3 Referring to page six of Exhibit Three,  
4 that shows -- shows all the -- all the small lakes in the  
5 area and it shows the present two operating disposal systems  
6 of B&E and UniChem, and then the Permian system, which is on  
7 the lake just to the west of the lake labeled Laguna Tres.

8 Q And you have then added to the original  
9 Exhibit Number Three the designation of where the Permian  
10 site would be located?

11 A Yes, I have. Also there is a -- to the  
12 north there on Lindsay Lake, there is a system that has been  
13 authorized to Requeza, and that system is not in operation  
14 at this time. It's my understanding that B&E bought them  
15 out and that -- that system will never -- never be operated.

16 Q Is Permian Corporation utilizing any dis-  
17 posal site currently in this area?

18 A Yes, they are disposing, presently dis-  
19 posing of their water that they're hauling to B&E at this  
20 time.

21 Q Would you just in general describe for  
22 the Division what -- what this particular area consists of,  
23 the lakes, and so forth.

24 A Very briefly, the Rustler formation out-  
25 crops in this area. There has been subsidence in the

1 Rustler, which -- which created Nash Draw, and all of these  
2 lakes are in Nash Draw.

3 Referring to page six on Exhibit Three,  
4 International Minerals and Chemical Corporation is disposing  
5 of around 3,244 gallons per minute into Laguna Uno. There  
6 is no -- this is a completely closed lake and it's higher in  
7 elevation than the rest of the lakes.

8 In the summertime it is -- it is thought  
9 that the majority of this water evaporates out of Laguna  
10 Uno, but in the wintertime, why, it seeps into the ground  
11 and becomes part of the groundwater system and then pops up  
12 in the other lakes down dip, Laguna Dos, Laguna Cuatro, La-  
13 guna Tres, Requeza -- Lindsay Lake, and (not understood),  
14 and Laguna Seis, and then there are four other unnamed lakes  
15 in this area.

16 Then through -- through groundwater flow  
17 or through underground flow and through surface flow, the  
18 water eventually, some of the water eventually ends up into  
19 the Salt Lake, which is down to the southwest of the area.  
20 It is -- it is the lowest point in this area and this is a  
21 -- this is a huge, huge salt lake that is fed primarily from  
22 -- from the International Minerals and Chemical Corpora-  
23 tion's potash disposal.

24 Q Now referring in general to Permian Exhi-  
25 bit Number Three, can you tell us, sir, whether that is a



1 hydrological evaluation that was done for the prior case and  
2 utilized by the Commission, and by the applicant there to  
3 show what the hydrology of this area is?

4 A Yes. This was a study that was submitted  
5 in September of 1982 by GeoHydrology Associates, Mr. T. E.  
6 Kelly, President.

7 And I don't think, you know, there's been  
8 any change in the area. I've made a surface inspection and  
9 things -- things are still as -- as mentioned in the report  
10 there.

11 Q Now, Mr. Ramey, would you tell the Divi-  
12 sion what the proposal was with UniChem with regard to its  
13 disposal and what was already in existence at the time you  
14 began to -- submitted this application?

15 A There were already -- the Division had  
16 already approved the B&E disposal and had approved the Re-  
17 queza proposal when UniChem made their application. Uni-  
18 Chem's was just an application to dispose into Laguna Tres.

19 Q And I would direct your attention to  
20 pages 10 and 11 of Exhibit Number three, Mr. Ramey, and ask  
21 you first with regard to the graph shown on Exhibit Number  
22 Ten whether that graph, absent the Permian Corporation's ad-  
23 dition, was submitted as a part of this evaluation in 1982?

24 A Yes. The graph was submitted. It shows  
25 the maximum evaporation in wintertime according to this re-

1 port, was 508 gallons per minute. This graph showed the Re-  
2 queza of about 90 gallons per minute, and then the B&E of  
3 something in excess of 200 gallons per minute, and then Uni-  
4 Chem was around 50 gallons per minute, and then I've added  
5 the Permian, which -- which will bring the total authorized  
6 disposal up to around 400 gallons per minute, or around 78  
7 percent of the evaporation potential, winter evaporation  
8 potential. So that would leave approximately 22 percent  
9 margin for a safety margin.

10 A Yes.

11 Q And in your opinion is that sufficient  
12 safety margin in this area?

13 A Yes, it is.

14 Q Would you then refer to page 11, the next  
15 page, in other words, particularly paragraph number 2 of  
16 Exhibit Three, and tell the Division whether that was the  
17 hydrological report on what UniChem proposed to add to the  
18 disposal water?

19 A Yes. At that time, and still -- still  
20 is, based on evaporation rates that were taken at the big  
21 lake which is labeled Salt Lake, it was 509 gallons per  
22 minute for the smaller lakes, not counting -- not counting  
23 the big lake, and at that time, why, the total discharge  
24 would have been about 364, and you add -- add the Permian's  
25 of I think it's 29 gallons per minute, why, that brings it

1 up to almost 400 of the -- 509 winter evaporation rate.

2 Q And you have previously referred to  
3 Exhibit -- Permian Exhibit Number Four. Would you take that  
4 before you now and tell the Commission, the Division, what  
5 it is?

6 A Over the last six months, I called the  
7 Artesia Office and asked them to furnish me the last six  
8 months disposal or through what they had available, and the  
9 UniChem is disposing an average of 1390 barrels per day or  
10 something over 40 gallons per minute, and B&E is disposing  
11 of an average of 4167 barrels per day, or 121.5 gallons per  
12 minute.

13 Q Does the total UniChem disposal figure  
14 include what's been tendered at that site by Permian?

15 A Yes, Permian is presently disposing of  
16 around 500 barrels per day at the B&E site.

17 Q Mr. Ramey, you have prepared a schematic  
18 layout of the equipment that you propose, Permian proposes to  
19 site at the disposal site or locate at the disposal site if  
20 this application is approved.

21 Would you now refer to Exhibit Number Two  
22 and tell the Division exactly what that shows?

23 A Yes. This is -- it's a series of three  
24 500 barrel tanks and a 300 barrel tank and then also a 210  
25 barrel skim oil tank and a 110 barrel solids tank.

1           The water will be trucked in and will en-  
2 ter the first tank, or the gunbarrel, which is the 500 bar-  
3 rel gunbarrel, and will enter that and when it reaches a  
4 certain level, why, it -- the water will skim off into the  
5 number two tank and then when that reaches a certain level  
6 goes to the third tank and then to the fourth tank, and then  
7 finally to the Lacos (sic) super separator for final solid  
8 disposal.

9           Any oil will skim off in the first four  
10 tanks and the little Lacos super separator will by centrifu-  
11 gal action take out any remaining solids.

12           Q           Mr. Ramey, was page two then of Exhibit  
13 Two a written description of the operation of this equip-  
14 ment?

15           A           Yes, it is. And as noted on this, the  
16 tanks one, two, three, and four will be checked, you know,  
17 on a regular basis for -- for any accumulated oil or solids.  
18 And as the solids build up, why the tanks will be cleaned of  
19 the solids and any oil that gets over into the second,  
20 third, and fourth tanks will be skimmed off and put into the  
21 210-barrel skim oil tank.

22           I might add that any, any oil that is ac-  
23 cumulated will be carried to a treating system of some kind  
24 or, you know, will go through an oil treating plant and any  
25 solids that are accumulated will be disposed of at a solid

1 waste disposal site as approved by the Division.

2 Q Can you tell us, sir, whether you have an  
3 opinion as to whether the granting of this application would  
4 create an inflow of water that is in excess of the known cap-  
5 acity of the lakes?

6 A No, it will not.

7 Q Is the area sufficient to contain the ad-  
8 ditional water that would be disposed there?

9 A Yes, it is. It is sufficient area. In  
10 the wintertime these lakes get -- get large. They're much  
11 larger than is illustrated on page six of Exhibit Three.

12 For example, the lake that Permian will  
13 dispose into, when I -- when I visited the site, why, it was  
14 -- it was a part of Laguna Tres, and there are -- there are  
15 ditches between all of these lakes south of State Road 28.  
16 The Highway Department has gone in and has ditched, put  
17 ditches between the lakes so that -- to keep the road, keep  
18 the highway from being covered with water.

19 Q Do you have an opinion as to whether  
20 there is a sufficient margin of safety remaining to the eva-  
21 poration rate in the area after the disposal of the Permian?

22 A Yes, I think the 22 percent safety factor  
23 is certainly -- certainly ample to insure that any water put  
24 in the lake will evaporate right in the area.

25 Q Do you have an opinion as to whether the

1 grant of this application and the discharge of the oilfield  
2 produced brine would be compatible with the best usage of  
3 the area?

4 A Yes. It certainly -- certainly won't,  
5 you know, hurt the quality of the water in the lakes. Part  
6 of Exhibit Three is the analysis of lake water and analysis  
7 of the Bone Spring and Morrow waters which are the waters  
8 that Permian is Hauling, and they are reasonably compatible.

9 Q Would the granting of this application  
10 enhance the competitive situation in the area?

11 A Yes, this will -- this will give Permian  
12 at least, you know, a competitive -- not a competitive edge  
13 but where they will be competitive with other haulers in the  
14 area, and this is a reasonably inexpensive disposal method  
15 and should - should prolong the producing life of the wells  
16 that are producing the water in the area.

17 Q Would the grant of the application and  
18 subsequent disposal of the water, brine water, by Permian  
19 cause any deterioration of the quality of water that's being  
20 disposed of in that area?

21 A No.

22 MR. SNEAD: We have no further  
23 direct, Mr. Hearing Examiner.

24 We tender Exhibits One through  
25 Five.

1 MR. CATANCH: The Exhibits One  
2 through Five are hereby admitted into evidence.

3 MR. SNEAD: Oh, I'm sorry, Mr.  
4 Hearing Examiner, I did neglect one area and that is notice  
5 of the interested parties.

6 Q Exhibit Five is your letter -- can you  
7 tell us -- your letter to the Commissioner of Public Lands  
8 and to the lessee of the surface interest. Can you tell the  
9 Division whether you have actually contacted the operator of  
10 the surface lease at that proposed site?

11 A Yes. The day I visited the area, why, we  
12 met Mr. Greenwood over there and discussed the disposal site  
13 and what we plan to do with him and he indicated that he  
14 would, you know, for money consideration would certainly  
15 sign a relinquishment of his grazing lease.

16 And the, you know, the Commissioner of  
17 Public Lands has contacted Mr. Lemay on this and, you know,  
18 suggested another method of doing it, but I had that -- he  
19 suggested that perhaps the business lease should be the  
20 first step, the State business lease should be the first  
21 step prior to getting an OCD order, but that is in direct  
22 conflict to what he's been requiring and after discussion  
23 with his staff, why, they have informed me that they have no  
24 objection to Permian obtaining the order and then  
25 approaching the Commissioner of Public Lands for the

1 business lease.

2 MR. SNEAD: And once again I  
3 have no further direct.

4

5 CROSS EXAMINATION

6 BY MR. CATANACH:

7 Q Mr. Ramey, the source of the water is  
8 Bone Spring and Morrow producing?

9 A Yes.

10 Q Are these fields in this general area?

11 A Yes. It's the fields back to the east  
12 primarily for the Bone Spring and then the Morrow production  
13 around Carlsbad.

14 Q Is it going to be limited to these two  
15 sources?

16 A That is -- that is our intent at this  
17 time, Mr. Examiner. I have advised Permian and they have  
18 told me that if they pick up any additional water they will  
19 run compatibility tests on it and have it analyzed and so  
20 notify the Division before they dispose of any -- any  
21 additional water through this system.

22 Q Okay, the volumes we're talking about  
23 there are what, now?

24 A 1000 barrels a day is what they're asking  
25 for as a maximum.



1 Q As a maximum.

2 A Yes.

3 Q What are they currently disposing of?

4 A Around 500 barrels per day. But as you  
5 know, there's a lot of gas production shut-in at this time  
6 and so they're -- the volume they're hauling is down over  
7 what they have hauled.

8 Q On Exhibit Number Three, is that volume  
9 that you have plotted on that graph, is that the 1000 bar-  
10 rels per day volume?

11 A Yes, but I think that figures out to  
12 about 29 gallons a minute.

13 Q 1000 barrels a day?

14 A Yes. Was I right?

15 Q Yes.

16 A Good. I might add, we're not going to  
17 utilize the entire northwest quarter of Section 2. We'll  
18 probably use five acres out of that. We'll have to survey  
19 it and such as that for the business lease; before we can  
20 obtain a business lease we'll have to -- we'll have to go in  
21 and survey out the area that we need, plus the roadway.

22 Q Okay, will you provide us with that sur-  
23 vey and the exact location of all the tanks?

24 A Yes, before -- before, you know, we ac-  
25 tively start construction, why, we will, you know, obtain a

1 business lease and a relinquishment from the surface lessee,  
2 and then we will be happy. Why don't you make that a provi-  
3 sion of the order, that we furnish you a plat of the actual  
4 disposal area and a schematic of the disposal facilities?

5 Q Mr. Ramey, I assume you're read this re-  
6 port by GeoHydrology.

7 A I've read it several times. I read it  
8 prior to approving the UniChem order when I was Division  
9 Director and I've read it several times since then in pre-  
10 paration of this.

11 Q What are the major conclusions of this  
12 report, the major highlights? Do they say that this won't  
13 be harmful to any fresh waters in the area?

14 A They -- well, there's essentially no  
15 fresh water in the area.

16 Q There is not?

17 A No. There is -- there is some ground-  
18 water in the area that comes off the slope, off the edges of  
19 Nash Draw down into the draw but this is, you know, highly,  
20 highly gyp water and it is certainly not in communication.  
21 Nash Draw is considerably lower than -- that this water and  
22 it seeps into the draw and there's certainly no reversal out  
23 of the draw into that groundwater.

24 There was, at one time there was a fresh  
25 water well in -- if you'll refer to page 6, labeled Nash

1 Well in Laguna Cuatro, but that -- but the lake has com-  
2 pletely covered that well and the, you know, the windmill  
3 tower has collapsed and is laying out there in the lake bed.  
4 And that was the last known, and there's another well up  
5 Laguna Uno to the north there, which is the J Bar F Well,  
6 which is also, you know, completely contaminated with --  
7 with the discharge from IMC.

8 So there is no -- there is no -- in the  
9 draw itself there is no fresh water. What fresh water was  
10 there has been contaminated by the discharge from the potash  
11 operations.

12 And it was concluded that the water to be  
13 disposed of was of a slightly better quality than the water  
14 in the lakes and that there would be no, no harm from -- to  
15 the water, to the lake area, by the discharge of this, you  
16 know, these small amounts of oilfield brine.

17 Q You said -- did you say that there was an  
18 analysis of the water from that particular lake?

19 A I thought one of these was. Well, let me  
20 check back here in the report.

21 There doesn't seem to be. I thought  
22 there was one but if you'll look on page 9 under, you know,  
23 chemical quality of proposed discharge, it says, "The sur-  
24 face water in Laguna Tres and adjoining ponds is similar to  
25 the sample presented in the appendix. Mixing of the brines

1 with the existing lake water would not produce a notable ef-  
2 fect on the water quality."

3 Q I see. So this study was done for the  
4 whole area right here, is that correct?

5 A Yes, it was. I think that GeoHydrology  
6 Associates did the analysis for all three applications, all  
7 three previous applications.

8 Q Okay. Would Permian Corporation be  
9 willing to submit a water analysis from the proposed  
10 discharge site?

11 A Yes.

12 Q Mr. Ramey, where are the -- do you know  
13 where the solids are going to be disposed of at this time?

14 A I would -- I would assume that either at  
15 Pollution Control or at the one that was -- I think it's  
16 been authorized by the Division for Mr. Abbott, Petro-  
17 Thermo.

18 I would assume that we would, you know,  
19 Permian would have these solids analyzed to determine what  
20 they are and then they will take care of them, but they're,  
21 you know, if they turn out to be a hazardous waste, why,  
22 they will have to dispose of them in an approved hazardous  
23 waste site.

24 I think primarily they're going to be  
25 iron sulfides, I understand. That's the solids problem that

1 the others are experiencing.

2 Q Mr. Ramey, the chemical that's initially  
3 added to the disposal water, do you know what that is or --

4 A No, I do not. I did not.

5 Q Is that -- do you know if that's designed  
6 to aid in the separate of the oil and water?

7 A Yes, and I'm sure that will be used only  
8 if it is necessary. The flow description says that we will  
9 have chemically treated water in there but if they put water  
10 in and it adequately separates without any chemicals, why,  
11 they would be foolish to use chemicals.

12 Q Mr. Ramey, do you think the proposed  
13 facilities are adequate to keep any oil from ever reaching  
14 -- getting into the lake?

15 A Yes, I certainly do. You get about 2300  
16 barrels as a -- or 1800, 1800 barrels, so you're going to  
17 have, you know. almost 36 hours of retention time in the  
18 tanks before, and if not, why, you know, if there's any in-  
19 dication that there's any -- any oil going to reach the  
20 lake, why, I think they would probably have to put a pit out  
21 there of some kind for further retention time.

22 But they're aware that you're not going  
23 to allow any oil to get in the lakes and if it does, they're  
24 going to clean it up.

25 Q Okay, how will the site be monitored?

1 Will somebody be there daily or --

2           A           This will be monitored out of Permian's  
3 Carlsbad office; only their -- this will be strictly a Per-  
4 mian operation, and only their drivers will be authorized to  
5 dump the oil, so every -- or dump the -- dispose of the  
6 water, and so it will be physically monitored every time  
7 there's a load brought in.

8           Q           But as far as actually monitoring the  
9 discharge into the lake, that won't be monitored at all,  
10 will it?

11          A           Oh, yes, yes, it will. There will be --  
12 I have discussed this and they -- they plan on somebody out  
13 of Carlsbad visiting the site every day.

14          Q           Okay, that's what I mean.

15          A           But the truck driver, as I understand,  
16 will be monitoring the tanks for solid accumulation and oil  
17 accumulation in addition, you know, as they -- as they bring  
18 in a load, why, they will -- they will look at these things.

19

20

21                           CROSS EXAMINATION

22 BY MR. TAYLOR:

23          Q           Mr. Ramey, I think on the Petro-Thermo  
24 order we required them to post a bond with us for surface  
25 cleanup but as I understand it, any business lease you get

1 from the Land Office would probably also require that, so is  
2 it satisfactory if we require that you post a clean up bond  
3 with someone, either us or the Land Office?

4 A Yes.

5 Q And that way if they require it absolute-  
6 ly in their lease you won't be required to post one with us.  
7 If they don't require it you'll have to post one with us.

8 A That will be fine. I'm reasonably cer-  
9 tain that the Land Office will require a bond.

10 Q Okay.

11 A Which will be in conjunction with the  
12 business lease.

13 Q This is what I --

14 A But if they -- if we get that waived,  
15 why, we'll be glad to post one with you. Yes.

16 MR. CATANACH: That will have  
17 to be determined before we write an order.

18 MR. TAYLOR: No, we can put  
19 language in that that says they'll post bond with someone.

20 MR. CATANACH: Okay.

21 A That would be best for our position to  
22 put a provision in the order for that, if you will.

23 MR. CATANACH: I have no fur-  
24 ther questions of the witness.

25 Are there any other questions

1 of this witness?

2 If not, he may be excused.

3 I guess we'll hold the record  
4 open on this case until I receive the analysis, Mr. Ramey,  
5 that I asked for --

6 A Of the lake water.

7 MR. CATANACH: -- of the lake  
8 water, and let's see, I think that's it.

9 A Okay.

10 MR. CATANACH: And then we'll  
11 take it under advisement.

12 A Okay. Thank you.

13

14 (Hearing concluded.)

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C E R T I F I C A T E

I, SALLY W. BOYD, C.S.R., DO  
HEREBY CERTIFY the foregoing Transcript of Hearing before  
the Oil Conservation Division (Commission) was reported by  
me; that the said transcript is a full, true, and correct  
record of the hearing, prepared by me to the best of my  
ability.

Sally W. Boyd CSR

I do hereby certify that the foregoing is  
a complete record of the proceedings in  
the Exam. hearing of Case No. 9140,  
heard by me on June 3 1987.

David R. Catant, Examiner  
Oil Conservation Division