

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:

APPLICATION OF PLATINUM EXPLORATION,  
INC. FOR APPROVAL OF A SALT WATER  
DISPOSAL WELL, LEA COUNTY, NEW MEXICO.

Case No. 13320

ENTRY OF APPEARANCE

James Bruce enters his appearance in the above case on behalf of  
the applicant, Platinum Exploration, Inc.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by  
the Oil Conservation Division.

APPEARANCES

APPLICANT

Platinum Exploration, Inc.

Midland, Texas 79702

Attention: Greg Rasmussen  
(432) 687-1664

APPLICANT'S ATTORNEY

James Bruce

P.O. Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

OPPONENT

Woody Investments, LLC

OPPONENT'S ATTORNEY

W. Thomas Kellahin

STATEMENT OF THE CASE

APPLICANT

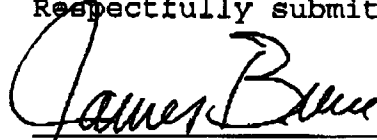
Applicant seeks approval to use its Whitten Well No. 1, located 990  
feet from the north line and 1680 feet from the west line (Unit C)  
of Section 35, Township 16 South, Range 38 East, NMPM, to dispose  
of produced water into the Devonian formation from an openhole  
interval of 12,250-13,000 feet.

THIS CASE HAS BEEN HEARD, AND THE MATTER WAS HELD OPEN TO SUBMIT  
ADDITIONAL DATA. THAT DATA WILL BE SUBMITTED AT HEARING.

OPPONENT

**PROPOSED EVIDENCE****APPLICANT****WITNESSES****EST. TIME****EXHIBITS****OPPONENT****WITNESSES****EST. TIME****EXHIBITS****PROCEDURAL MATTERS****-None-**

Respectfully submitted,



James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Platinum  
Exploration, Inc.

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing pleading was served upon the following counsel of record this 1st day of October, 2004, by facsimile transmission:

W. Thomas Kellahin  
Kellahin & Kellahin  
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James Bruce