

**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:**

CASE NO. 3406

**APPLICATION OF SEELY OIL COMPANY FOR
AMENDMENT OF THE REMEDIAL CEMENTING
REQUIREMENTS OF DIVISION ORDER NO. R-
11929 WHICH APPROVED WATERFLOOD
OPERATIONS IN THE EK PENROSE SAND UNIT,
LEA COUNTY, NEW MEXICO.**

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PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

Seely Oil Company
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ATTORNEY

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STATEMENT OF CASE

APPLICANT

Applicant seeks an order amending Order No. R-11929 to eliminate the cementing requirements for the McElvain Federal Well No. 3 (API No. 30-025-28557) located in the

SW/4 SW/4 of Section 30, Township 18 South, Range 34 East NMPM, Lea County, New Mexico. Said well is located approximately 14 miles southwest of Lovington, New Mexico

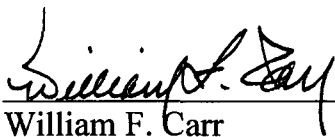
PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and Expertise)	ESTIMATED TIME	EXHIBITS
David Henderson (Petroleum Engineer)	Approx. 15 Minutes	Approx. 6

PROCEDURAL MATTERS

Seely Oil Company has none at this time.



William F. Carr
Attorney for Seely Oil Company