

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

**APPLICATION OF SOUTHBOUND GAS COMPANY  
FOR APPROVAL OF A SALT WATER DISPOSAL  
WELL, LEA COUNTY, NEW MEXICO.**

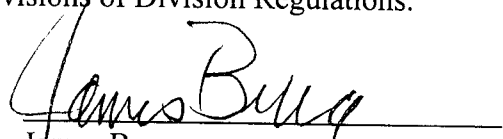
**Case No. 16393**

**AFFIDAVIT OF NOTICE**

COUNTY OF SANTA FE    )  
  ) ss.  
STATE OF NEW MEXICO    )

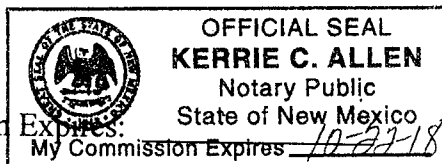
James Bruce, being duly sworn upon his oath, deposes and states:

1.     I am over the age of 18, and have personal knowledge of the matters stated herein.
2.     I am an attorney for Southbound Gas Company.
3.     Southbound Gas Company has conducted a good faith, diligent effort to find the names and correct addresses of the interest owners entitled to receive notice of the application filed herein.
4.     Notice of the application was provided to the interest owner, at its proper address, by certified mail. Copies of the notice letter and certified return receipt are attached hereto as Attachment A.
5.     Applicant has complied with the notice provisions of Division Regulations.

  
James Bruce

SUBSCRIBED AND SWORN TO before me this 5<sup>th</sup> day of September, 2018 by James Bruce.

My Commission Expires:



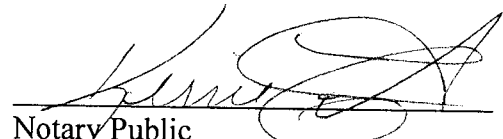
  
Notary Public

EXHIBIT /

**JAMES BRUCE**  
ATTORNEY AT LAW

POST OFFICE BOX 1056  
SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213  
SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone)  
(505) 660-6612 (Cell)  
(505) 982-2151 (Fax)  
[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

August 14, 2018

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Woody Investments, LLC  
c/o Patrick B. McMahon  
Heidel, Samberson, Cox & McMahon  
P.O. Drawer 1599  
Lovington, New Mexico 88260


Ladies and gentlemen:

Enclosed is a copy of an application for approval of a salt water disposal well, filed with the New Mexico Oil Conservation Division by Southbound Gas Company, regarding a well in the SW $\frac{1}{4}$ NE $\frac{1}{4}$  of Section 23, Township 2 South, Range 29 East, N.M.P.M., Roosevelt County, New Mexico.

This matter is scheduled for hearing at 8:15 a.m. on September 6, 2018, at the Division's offices at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505. You are not required to attend this hearing, but as an owner of an interest that may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from contesting the matter at a later date.

A party appearing in a Division case is required by Division Rules to file a Pre-Hearing Statement no later than Thursday, August 30, 2018. This statement must be filed with the Division's Santa Fe office at the above address, and should include: The names of the party and its attorney; a concise statement of the case; the names of the witnesses the party will call to testify at the hearing; the approximate time the party will need to present its case; and identification of any procedural matters that need to be resolved prior to the hearing. The Pre-Hearing Statement must also be provided to the undersigned.

Very truly yours,

  
James Bruce

Attorney for Southbound Gas Company

ATTACHMENT

**A**

7236 2188 0000 0960 8102

**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
 Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

Certified Mail Fee  
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Extra Services & Fees (check box, add fee as appropriate)

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☐ Return Receipt (electronic) \$ \_\_\_\_\_

☐ Certified Mail Restricted Delivery \$ \_\_\_\_\_

☐ Adult Signature Required \$ \_\_\_\_\_

☐ Adult Signature Restricted Delivery \$ \_\_\_\_\_

Postage  
 \$ \_\_\_\_\_

Total Postage at \$ \_\_\_\_\_

Postmark  
 Here

Sent To **Woody Investments, LLC**  
**c/o Patrick B. McMahon**  
**Heidel, Samberson, Cox & McMahon**  
 Street and Apt. # **P.O. Drawer 1599**  
 City, State, ZIP+4® **Lovington, New Mexico 88260**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Woody Investments, LLC  
 c/o Patrick B. McMahon  
 Heidel, Samberson, Cox & McMahon  
 P.O. Drawer 1599  
 Lovington, New Mexico 88260



9590 9402 4079 8092 0247 95

2. Article Number (Transfer from service label)

7018 0360 0000 2188 7236

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature **X** ☐ Agent ☐ Addressee

B. Received by (Printed Name) **Patrick B. McMahon** C. Date of Delivery **8-17-18**

D. Is delivery address different from item 1? ☐ Yes ☐ No  
 If YES, enter delivery address below:

3. Service Type
- ☐ Adult Signature ☐ Priority Mail Express®
- ☐ Adult Signature Restricted Delivery ☐ Registered Mail™
- ☒ Certified Mail® ☐ Registered Mail Restricted Delivery
- ☐ Certified Mail Restricted Delivery ☐ Return Receipt for Merchandise
- ☐ Collect on Delivery ☐ Signature Confirmation™
- ☐ Collect on Delivery Restricted Delivery ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

*Southbound*

Domestic Return Receipt