

**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 NACOGDOCHES OIL AND  
GAS, INC. FOR APPROVAL OF A WATER DISPOSAL  
WELL, MCKINLEY COUNTY, NEW MEXICO**

**Case No. 14,337**

**AMENDED PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by Nacogdoches Oil and Gas, Inc. ("NOG") as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Nacogdoches Oil and Gas, Inc.  
P.O. Box 632418  
Nacogdoches, Texas 75963

Attention: Mike Finley  
(936) 560-4747

**APPLICANT'S ATTORNEY**

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

**OPPONENT**

Oil Conservation Division

**OPPONENT'S ATTORNEY**

Mikal Altomare

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**STATEMENT OF THE CASE**

**APPLICANT**

Applicant seeks an order approving water disposal into the Entrada formation in the South Hospah Unit Well No. 9, located 330 feet from the north line and 2051 feet from the east line of Section 12, Township 17 North, Range 9 West, NMPM.

NOG has a number of out-of-compliance wells, although it has been diligently working on bringing wells into compliance. NOG's activities are constrained by current limits on its water disposal capabilities, which limits the number of wells which it can produce. Approval of the water disposal application will increase its disposal capability, which will allow it to bring wells into compliance.

**OPPONENT**

## PROPOSED EVIDENCE

### APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Mike Allen (V.P. - Engineering)	20 min.	Form C-108
Brian Wood (Regulatory consultant)	Possible witness	Form C-108
Mike Dehnisch (V.P. - Operations)	Possible witness.	
(President)		

### OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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## PROCEDURAL MATTERS

The Division has filed a motion requesting that this case be continued due to Case 14326 (a compliance case). Applicant objects to a continuance, because it needs the disposal well to bring wells into compliance. In addition, the witnesses for this application will be in town for the compliance hearing, and it is practical and economic to allow them to testify next Thursday. Applicant will be filing a response in objection to the motion.

Respectfully submitted,



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

Attorney for Nacogdoches Oil and Gas, Inc.

cc: Mikal Altomare