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APPLICATION OF SMITH & MARRS INC. FOR A PRESSURE MAINTENANCE PROJECT IN THE DELAWARE FORMATION, IN EDDY COUNTY, NEW MEXICO.

Case No. 15371

PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted by Smith and Marrs, Inc., by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT: Smith & Marrs Inc.

ATTORNEY: Ernest L. Padilla

Padilla Law Firm, P.A.

P.O. Box 2523

Santa Fe, New Mexico 87504

(505) 988-7577

padillalaw@qwestoffice.net

OPPOSITION OR OTHER PARTY:

(Unknown)

STATEMENT OF CASE

APPLICANT:

Applicant seeks approval to institute a lease pressure maintenance project in its Superior State #1, located in Unit H, Section 8, Township 25 South, Range 30 East, N.M.P.M., Eddy County, New Mexico. Applicant intends to inject produced water into the Delaware Sand formation through its Superior State #1 well located 1980' FNL and 660' FEL, Unit H, Section 8, Township 25 South, Range 30 East, N.M.P.M., Eddy County, New Mexico, at depths of 3736' to 3776' feet (perforated).

OPPOSITION OR OTHER PARTY:

(Unknown)

PROPOSED EVIDENCE

APPLICANT

WITNESSES John Maxey (engineer) EST. TIME 30 min.

EXHIBITS C-108

Isopac Map

Geologic Cross Section

Reservoir Data

Water Flood Parameters Other Geologic Mapping

Ernest L. Padilla

Affidavit of Service

OPPOSITION

WITNESSES

EST, TIME

EXHIBITS

(Unknown)

PROCEDURAL MATTERS

None.

Respectfully submitted,

PADILLA LAW FIRM, P.A.

/s/ ERNEST L. PADILLA

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