

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

APPLICATION OF THE NEW MEXICO OIL CONSERVATION DIVISION
COMPLIANCE AND ENFORCEMENT BUREAU FOR A COMPLIANCE ORDER
AGAINST PRIMAL ENERGY CORPORATION, FOR WELLS OPERATED IN
LEA AND EDDY COUNTIES, NEW MEXICO

CASE NO 15686

AMENDED PRE-HEARING STATEMENT

Applicant Oil Conservation Division Compliance and Enforcement Bureau (OCD or Bureau) is seeking an order declaring

- 1 That Primal Energy Corporation, (Primal or Operator) is out of compliance with 19 15 8 NMAC and NMSA 1978 § 70 2-14
- 2 That Operator must comply with OCD Rules within 60 days of the issuance of a Division order
- 3 If Operator does not comply with Division order finding that Operator is out of compliance with a Division order

The Bureau supports the approval because of the following

- 1 Notice of Hearing was properly served as required by 19 15 4 9 NMAC and 19 15 4 10 NMAC
- 2 The Bureau will present evidence that Operator currently has 10 wells out of compliance with Division Rule 19 15 8 NMAC

/s/

PETITIONERS'S PROPOSED EVIDENCE

WITNESS

ESTIMATED TIME 5 minutes

The Applicant has no witnesses and one exhibit, a Stipulated Order agreed to by both the Applicant and the Operator in lieu of testimony. The Stipulated Order includes agreed findings and schedule for the Operator to return to compliance.

The Bureau reserves the right to call additional witnesses not listed herein on rebuttal.

PROCEDURAL MATTERS

None

Respectfully submitted
this 4 day of May 2017 by

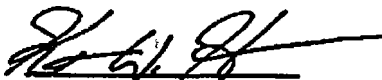


Keith W. Herrmann
Energy Minerals and Natural
Resources Department
1220 S. St. Francis Drive
Santa Fe, NM 87505
(505) 476 3463
(505) 476-3462 (fax)
Email: *Keith.Herrmann@state.nm.us*
Attorney for the Oil Conservation Division
Compliance and Enforcement Bureau

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was sent electronically to the following party on May 4 2017.

Paul Funkhouser
Attorney for Primal Energy Corporation
Via Email: *pfunk@primalenergy.net*



Keith W. Herrmann