

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

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

2017 11 16 10 30

**Case No 15671**

**AMENDED PRE-HEARING STATEMENT**

This Amended 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  
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**OPPOSITION OR OTHER PARTY**

COG Operating LLC

**ATTORNEY**

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## **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**

20 min

#### **EXHIBITS**

C 108  
Area Map  
Geologic Cross Sections  
Oil Cum Data  
Data Sheet

Tony Krakauskas  
(landman)

15 min

Land & Ownership Plats

Ernest L Padilla

Affidavit of Service

### **OPPOSITION**

#### **WITNESSES**

(Unknown)

#### **EST TIME**

#### **EXHIBITS**

## **PROCEDURAL MATTERS**

None

Respectfully submitted

PADILLA LAW FIRM P A

/s/ ERNEST L PADILLA

ERNEST L PADILLA

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was electronically transmitted on this 17<sup>th</sup> day of May 2017 to the following

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