

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

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**APPLICATION OF THE NEW MEXICO OIL CONSERVATION DIVISION
COMPLIANCE AND ENFORCEMENT BUREAU FOR A COMPLIANCE ORDER
AGAINST JACK J. GRYNBERG, FOR WELLS OPERATED IN CHAVES
COUNTY, NEW MEXICO.**

CASE NO. 15735

AMENDED PRE-HEARING STATEMENT

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

1. That Jack J. Grynberg, ("Jack J. Grynberg" 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 30 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 2 wells out of compliance with Division Rule 19.15.8 NMAC.

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 29 day of June, 2017 by



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was sent electronically to the following party on June ____, 2017:

Roger Jatko
Max Yefimenko
Attorney for Jack J. Grynberg
Via Email: pfunk@primalenergy.net
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Keith W. Herrmann