## with offer

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

APPLICATION OF THE NEW MEXICO OIL CONSERVATION DIVISION FOR AN ORDER REQUIRING THE ESTATE OF REUBEN F. MOMSEN TO PLUG ONE WELL AND ORDERING A FORFEITURE OF APPLICABLE FINANCIAL ASSURANCE IN EVENT OF OPERATOR'S NON-COMPLIANCE; EDDY COUNTY, NEW MEXICO.

**CASE NO. 13713** 

## APPLICANT'S PRE-HEARING STATEMENT

A. Parties and Attorneys:

**Applicant** 

The New Mexico Oil Conservation Division

Attorney

David K. Brooks

Respondents:

The Estate of Reuben F. Momsen

(No appearance)

American Employers' Insurance Company

(No appearance)

B. Statement of the Case:

The Division seeks an order requiring The Estate of Reuben F. Momsen to plug one well in Eddy County, and, in event of non-compliance, forfeiting a \$5,000 single-well surety bond issued by American Employers' Insurance Company.

C. Witnesses for Applicant:

Van Barton, oil and gas inspector, District II

D. Time to Present Case:

15 minutes

E. Procedural Matters: None

RESPECTFULLY SUBMITTED,

David K. Brooks

Assistant General Counsel

Energy, Minerals and Natural Resources Department of the State of

New Mexico

1220 S. St. Francis Drive Santa Fe, NM 87505

(505)-476-3450

Attorney for The New Mexico Oil Conservation Division