

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

**IN THE MATTER OF THE HEARING CALLED BY THE
OIL CONSERVATION DIVISION FOR THE PURPOSES
OF CONSIDERING:**

CASE NO. 14163

**APPLICATION OF THE NEW MEXICO OIL CONSERVATION DIVISION,
THROUGH THE ENFORCEMENT AND COMPLIANCE MANAGER, FOR A
COMPLIANCE ORDER AGAINST C.W. TRAINER PURSUANT TO NMSA 1978,
SECTION 70-2-14(B) ORDERING C.W. TRAINER TO PLUG AND ABANDON ALL
WELLS IT OPERATES IN NEW MEXICO BY A DATE CERTAIN AND
AUTHORIZING THE DIVISION TO PLUG SAID WELLS AND FORFEIT THE
APPLICABLE FINANCIAL ASSURANCE IN THE EVENT OF NON-COMPLIANCE,
LEA AND CHAVES COUNTIES, NEW MEXICO.**

RESPONDENT'S ENTRY OF APPEARANCE AND PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Oil Conservation Division

ATTORNEY

Gail MacQuesten
Energy, Minerals and Natural Resources Dept.
1220 S. St. Francis Drive
Santa Fe, NM 87505
(505) 476-3451

RESPONDENT

C.W. Trainer
P.O. Box 754
Midland, TX 79702

ATTORNEY

Ocean Munds-Dry
Holland & Hart, LLP
P.O. Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

RECEIVED
2008 MAR 27 PM 2 31

STATEMENT OF CASE

APPLICANT

RESPONDENT

Respondent has been working diligently to come into compliance with Division rules. Respondent therefore respectfully requests it be given additional time to come into compliance and that the Division not order all Respondent's wells to be plugged.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

ESTIMATED TIME

EXHIBITS

RESPONDENT

WITNESSES

ESTIMATED TIME

EXHIBITS

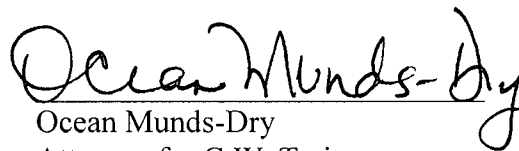
C.W. Trainer

Approx. 15 minutes

Approx. 10

PROCEDURAL MATTERS

Trainer has none at this time.


Ocean Munds-Dry
Attorney for C.W. Trainer