

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

**IN THE MATTER OF THE APPLICATION OF THE BOARD  
OF COUNTY COMMISSIONERS OF RIO ARriba COUNTY  
FOR CANCELLATION OR SUSPENSION OF APPLICATIONS  
FOR PERMITS TO DRILL (APD'S) FILED BY APPROACH  
OPERATING, LLC, RIO ARriba COUNTY, NEW MEXICO**

**CASE NO. 14134**

**IN THE MATTER OF THE APPLICATION OF  
APPROACH OPERATING, LLC FOR APPROVAL  
OF SIX APPLICATIONS FOR PERMITS TO DRILL,  
RIO ARriba COUNTY, NEW MEXICO**

**CASE NO. 14141**

**PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by Montgomery and Andrews, P.A. (J. Scott Hall) on behalf of Approach Operating, LLC, as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT'S ATTORNEY**

Ted J. Trujillo, Esq.  
P. O. Box 2185  
Espanola, NM 87532-2185  
(505) 753-5150

**APPLICANT**

Board of County Commissioners  
of Rio Arriba County

**OTHER PARTY'S ATTORNEY**

J. Scott Hall, Esq.  
Montgomery and Andrews, P.A.  
Post Office Box 2307  
Santa Fe, New Mexico 87504  
(505) 982-3873

**OTHER PARTY**

Approach Operating, LLC

## STATEMENT OF THE CASE

### APPLICANT

In Case No. 14134, Applicant seeks an order canceling or suspending APD's for four wells previously approved by the Division. Applicant contends that drilling of the wells will cause waste, violate correlative rights and will be injurious to human health and the environment.

### OPPOSITION OR OTHER PARTY

Approach Operating, LLC disputes Applicant's contentions in Case No. 14134. In Case No. 14141, Approach seeks approval of APD's for six additional wells. All of the wells involved in both cases are located on a single lease in Rio Arriba County.

## PROPOSED EVIDENCE

### APPLICANT

#### WITNESSES

#### EST. TIME

#### NO. OF EXHIBITS

### OPPOSITION OR OTHER PARTY

#### WITNESSES

#### EST. TIME

#### NO. OF EXHIBITS

#### Approach Operating, LLC

Ralph Manoushagian, Landman

20 Minutes

3

Glenn Reed, Petroleum Engineer

90 Minutes

15

Ross Craft, Geologist

30 Minutes

6

Peter Maggiore, Hydro-Geologist

60 Minutes

6

Greg Swindle, Health, Safety  
and Environmental Consultant

30 Minutes

8

Dennis Johnson, Closed-Loop

Drilling Design and Implementation

30 Minutes

6

## PROCEDURAL MATTERS

Approach Operating, LLC waives no rights or objections due to the Board of County Commissioners' failure to comply with Rules 1206 and 1207 of the Division's Rules and Regulations.

MONTGOMERY & ANDREWS, P.A.

By: T. J. Scott Hall  
J. Scott Hall, Esq.  
Post Office Box 2307  
Santa Fe, New Mexico 87504  
(505) 982-3873  
Attorneys for Approach Operating, LLC

### Certificate of Service

I hereby certify that a true and correct copy of the foregoing was faxed to counsel of record on the 17th day of June, 2008 as follows:

Ted J. Trujillo, Esq. P. O. Box 2185 Espanola, NM 87532-2185 (505) 753-4750 [facsimile]	
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T. J. Scott Hall  
J. Scott Hall