

①

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

**APPLICATION OF THE OIL CONSERVATION DIVISION, THROUGH THE ENFORCEMENT & COMPLIANCE MANAGER, FOR A COMPLIANCE ORDER AGAINST OPERATOR CORINNE GRACE, FINDING OPERATOR IN VIOLATION OF 19.15.25.8 NMAC AS TO CUEVA UNIT #1, REQUIRING OPERATOR TO PLUG AND ABANDON SAID WELL BY A DATE CERTAIN, AND AUTHORIZING THE DIVISION TO FORFEIT THE APPLICABLE FINANCIAL ASSURANCE AND PLUG THE WELL IN THE EVENT OF OPERATOR'S NON-COMPLIANCE, EDDY COUNTY, NEW MEXICO.**

**CASE NO. 14560**

**PRE-HEARING STATEMENT**

This Pre-hearing Statement is submitted by CORINNE GRACE, by and through its undersigned counsel, Ernest L. Padilla, Padilla Law Firm, P.A. as required by the Oil Conservation Commission.

**APPEARANCES OF PARTIES**

ATTORNEY

APPLICANT:

OIL CONSERVATION DIVISION

Sonny Swazo  
Assistant General Counsel  
Energy, Minerals and Natural  
Resources Department of the  
State of New Mexico  
1220 S. St. Francis Dr.  
Santa Fe, NM 87505  
(505) 476-3463  
FAX: 476-3480

OPPOSITON OR OTHER PARTY:

CORINNE GRACE

Ernest L. Padilla  
Padilla Law Firm, P.A.  
Post Office Box 2523  
Santa Fe, New Mexico 87504  
(505) 988-7577  
FAX: 988-7592

RECEIVED OGD  
200 OCT 31 P 2:24

**STATEMENT OF CASE**

**APPLICANT:**

**OPPOSITION OR OTHER PARTY:**

Applicant will present a C-103 and testimony concerning the plans and intentions of Corinne B. Grace to plug and abandon the subject well in accordance with OCD rules and regulations.

**PROPOSED EVIDENCE**

**APPLICANT**

WITNESSES

EST. TIME

EXHIBITS

Unknown

**OPPOSITION**

Eddie Seay

20 minutes

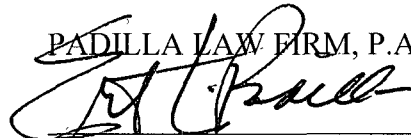
C-103

**PROCEDURAL MATTERS**

(Please identify any procedural matters which need to be resolved prior to hearing.)

None

PADILLA LAW FIRM, P.A.



Ernest L. Padilla

P.O. Box 2523

Santa Fe, New Mexico 87504-2523

(505) 988-7577

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a copy of this Pre-Hearing Statement to be served  
upon

Sonny Swazo  
Assistant General Counsel  
Energy, Minerals and Natural  
Resources Department of the  
State of New Mexico  
1220 S. St. Francis Dr.  
Santa Fe, New Mexico 87505  
sonny.swazo@state.nm.us

by hand-delivery on this 21st day of October, 2010.

  
\_\_\_\_\_  
ERNEST L. PADILLA