

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. 11358

APPLICATION OF NEARBURG EXPLORATION COMPANY  
TO TERMINATE SALT WATER DISPOSAL INTO CERTAIN  
INJECTION WELLS BY RESCINDING NMOCD PERMIT SWD-336  
AND BY RESCINDING ORDER R-7637 FOR ANADARKO  
PETROLEUM CORPORATION'S OSAGE WELL NO. 1  
EDDY COUNTY, NEW MEXICO

**PRE-HEARING STATEMENT**

COMES NOW, Nearburg Exploration Company, by and through its attorneys, Turner & Davis, and files its Pre-Hearing Statement for the referenced case.

1. Nearburg will call the following witnesses:

- (a) Tim MacDonald will testify regarding the damage to existing oil and gas production caused by the injection of water into the salt water disposal wells which are the subject matter of this case. Mr. MacDonald's testimony will be from the oil and gas engineering prospective.
- (b) Jerry Elger will testify regarding the geologic aspects of the injection of water by the salt water disposal wells which are the subject of this hearing.
- (c) Bob Shelton will testify regarding the land and ownership aspects of this case.

2. Our case-in-chief will be to demonstrate that damage has occurred and continues to occur to productive formations as a result of the water that is being injected into the salt water disposal wells which are the subject of this case.

Respectfully submitted,

**TURNER & DAVIS**

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By: J. Randy Turner  
J. Randy Turner  
State Bar No. 4009

ATTORNEYS FOR NEARBURG  
EXPLORATION COMPANY

I hereby certify that I caused to be  
mailed a true and correct copy of  
the foregoing to all counsel of record  
in Case No. 11358 this      day of  
August, 1995.

J. Randy Turner  
J. Randy Turner