

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

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OIL CONSERVATION DIVISION

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

**APPLICATION OF BP AMOCO PRODUCTION COMPANY  
FOR PERMIT MODIFICATION AND AN EXEMPTION TO  
CERTAIN PROVISIONS OF OIL CONSERVATION DIVISION  
RULE 711, SAN JUAN COUNTY, NEW MEXICO.**

**CASE NO. 12707**

**PRE-HEARING STATEMENT**

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

**APPEARANCES OF PARTIES**

**APPLICANT**

BP Amoco Production Company  
Attention: Colin Wasteney  
URS Corporation  
282 Delaware Avenue  
Buffalo, NY 14202-1805  
(716) 505-1010 ext. 1164

**ATTORNEY**

William F. Carr, Esq.  
Holland & Hart LLP and Campbell & Carr  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988.4421

## STATEMENT OF CASE

### APPLICANT

Applicant seeks an order modifying OCD Rule 711 Permit Approval NM-02-0003 for the BP Crouch Mesa Centralized Waste Management Facility and an exemption from the provision of Oil Conservation Division Rule 711 to permits it to accept wastes generated outside New Mexico at this centralized surface waste management facility. Applicant accepts for remediation by land farming crude oil contaminated soils from pump stations operated by BP which are part of the former ARCO Pipe Line crude oil pipeline (Line 90) that runs from New Mexico to southern California. Applicant seeks authorization to accept crude oil contaminated soils from two pump stations on this pipeline located in the state of Arizona and one pump station on this line located in the state of Utah. The BP Crouch Mesa Centralized Waste Management Facility is located in the SW/4 SE/4 of Section 2, Township 29 North, Range 12 West, NMPM which is approximately 4 miles southeast of Farmington, New Mexico.

## PROPOSED EVIDENCE

### APPLICANT

WITNESSES  
(Name and Expertise)

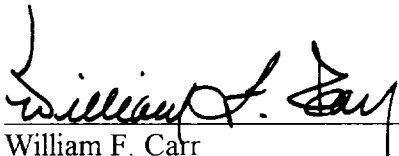
ESTIMATED TIME

EXHIBITS

NONE

## PROCEDURAL MATTERS

BP Amoco Production Company pursuant to an agreement with the examiner will present their case by Affidavit.

  
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William F. Carr  
Attorney for BP Amoco Production Company