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May 8, 1969

Case 4146

Oil Conservation Commission
P. O. Box 2088
Santa Fe, New Mexico 87501

Attention: Ida Rodriguez

RE: APPLICATION OF V. S. WELCH

Dear Ida:

Enclosed herewith you will find an Application which we are filing on behalf of Mr. V. S. Welch for an exception to Order No. R-3221. Please place this on the June 4 Examiner's Docket. I discussed the matter briefly with Mr. Porter and he indicated that if we got the Application in by the 15th of May we could have the hearing on June 4. If there is a possibility of having it at an earlier date, we would like to do so.

We will probably want to offer the testimony presented in Case No. 4024 in support of our applicant's position in this case, and I am wondering if the testimony has been transcribed and if so if it would be possible for me to borrow a copy of the transcript for a few days.

Yours very truly,

JENNINGS & COPPLE


James T. Jennings

Sent

JTJ/mb

Encl.

cc: V. S. Welch

DOCKET MARKED
Date 5-22-69

BEFORE THE OIL CONSERVATION COMMISSION
OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION
OF V. S. WELCH FOR AN EXCEPTION TO
ORDER NO. R-3221 TO PERMIT THE
DISPOSAL OF PRODUCED SALT WATER INTO
UNLINED OPEN SURFACE PITS IN EDDY
COUNTY, NEW MEXICO.

Case 4146

APPLICATION

COMES NOW V. S. WELCH, by his attorneys, Jennings & Copple, and seeks an exception to Order R-3221, as amended, to permit the disposal of produced salt water into unlined open surface pits located in the NE $\frac{1}{4}$ Section 28, Township 18 South, Range 31 East, N.M.P.M., Eddy County, New Mexico, and in support of his application states:

1. Applicant is the Operator of a lease covering the NE $\frac{1}{4}$ Section 28, Township 18 South, Range 31 East, N.M.P.M., upon which two wells have been completed and are producing from the Shugart Pool.

2. That the No. 1 (A) Well located in the NE $\frac{1}{4}$ NE $\frac{1}{4}$ Section 28, Township 18 South, Range 31 East, N.M.P.M., was completed on December 26, 1968, and at all times has produced its oil allowable. That the No. 2 (H) Well located in the SE $\frac{1}{4}$ NE $\frac{1}{4}$ Section 28, Township 18 South, Range 31 East, N.M.P.M., was completed April 22, 1969, and was initially potentialized for 72 barrels of oil per day. That the Operator has made a location for his No. 3 (B) Well located in the NW $\frac{1}{4}$ NE $\frac{1}{4}$, being 330 feet from the North line and 1650 feet from the East line of Section 28, Township 18 South, Range 31 East, N.M.P.M.

3. In connection with the production of oil from the two wells, there is produced about 70 barrels of salt water per day, which water is being disposed of in an open unlined surface tank located in the NE $\frac{1}{4}$ NE $\frac{1}{4}$ Section 28, Township 18 South, Range 31 East, N.M.P.M.

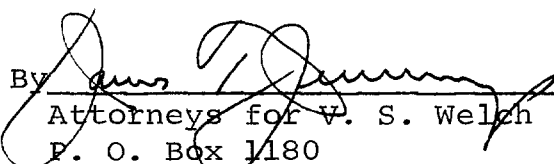
4. Applicant seeks permission to dispose of the produced salt water produced from the above mentioned wells and other wells that the applicant may drill upon his lease into open unlined pits located in the NE $\frac{1}{4}$ Section 28, Township 18 South, Range 31 East, N.M.P.M., as an exception to Order R-3221, as amended.

5. That there is no fresh or potable water in the vicinity and the only water available in the vicinity for any purpose is from the pipeline serving the potash mines in the area. That there are no salt water disposal facilities available in the area and it is not economical to truck the produced salt water to a disposal facility.

6. Approval of this application for an exception to Order R-3221, as amended, will prevent waste, protect correlative rights and will not injure any fresh water or present any threat of such injury.

WHEREFORE, Applicant requests that this application be set for hearing before the Commission or one of its examiners and that the Commission enter its Order granting Applicant an exception to Order R-3221, as amended, in accordance with this application.

JENNINGS & COPPLE

By 
Attorneys for V. S. Welch
P. O. Box 1180
Roswell, New Mexico, 88201