

JAMES T. JENNINGS  
ROGER L. COPPLE  
BRIAN W. COPPLE

LAW OFFICES OF  
**JENNINGS & COPPLE**  
1012 SECURITY NATIONAL BANK BUILDING  
P. O. BOX 1180  
ROSWELL, NEW MEXICO 88201

June 16, 1969

MAILED  
JUN 17 1969  
TELEPHONE 82-8432  
AREA CODE 505

*Case 4169*

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

RE: APPLICATION FOR EXCEPTION TO  
ORDER R-3221 - MASK, ET AL

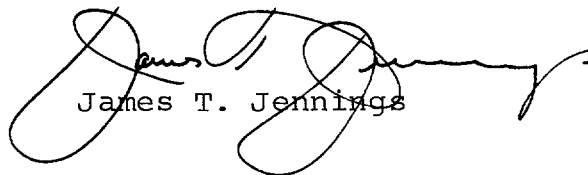
Gentlemen:

Enclosed herewith you will find an Application which we are filing on behalf of Mask, Jennings, Keohane & Westall for an exception to Order R-3221 in the Shugart Pool. We assume that this will be placed upon the docket for the July 9 Commission Hearing.

There have been a number of exceptions in the immediate vicinity of this property and any additional testimony would seem to be unnecessary, and I am wondering if it would be possible to submit the matter on the application based upon the testimony in Cases Nos. 4024, 4146 and 4132.

Yours very truly,

JENNINGS & COPPLE

*h. m. m. k.* →  
  
James T. Jennings

JTJ/mb

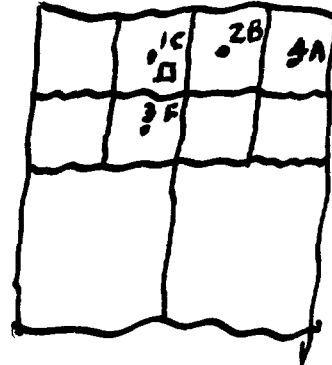
Encl.

DOCKET MAILED  
Date *6-25-69*

BEFORE THE OIL CONSERVATION COMMISSION  
OF THE STATE OF NEW MEXICO

*Case 4169*

IN THE MATTER OF THE APPLICATION  
OF MASK, JENNINGS, KEOHANE & WESTALL  
FOR AN EXCEPTION TO ORDER NO. R-3221  
TO PERMIT THE DISPOSAL OF PRODUCED  
SALT WATER INTO AN UNLINED OPEN SURFACE  
PIT IN EDDY COUNTY, NEW MEXICO.



APPLICATION

COME NOW Mask, Jennings, Keohane & Westall, by their attorneys, Jennings & Copple, and seek an exception to Order R-3221, as amended, to permit the disposal of produced salt water into an unlined open surface pit located in the NE $\frac{1}{4}$ NW $\frac{1}{4}$  Section 2, Township 19 South, Range 31 East, N.M.P.M., Eddy County, New Mexico, and in support of their application state:

1. Applicants are the Operators of a lease covering the E $\frac{1}{2}$ NW $\frac{1}{4}$  and NE $\frac{1}{4}$  Section 2, Township 19 South, Range 31 East, N.M.P.M., upon which the following described wells have been completed and are producing from the Shugart Pool:

No. 1-C	NE $\frac{1}{4}$ NW $\frac{1}{4}$ Section 2-19S-31E
No. 2-B	NW $\frac{1}{4}$ NE $\frac{1}{4}$ Section 2-19S-31E
No. 3-F	SE $\frac{1}{4}$ NW $\frac{1}{4}$ Section 2-19S-31E
No. 4-A	NE $\frac{1}{4}$ NE $\frac{1}{4}$ Section 2-19S-31E

2. That said wells produced 606 barrels of oil during May, 1969, 533 barrels of oil during April, 1969, and 569 barrels of oil during March, 1969.

3. In connection with the production of the oil from these four wells, there is produced a small amount of salt water from between 23 and 25 barrels per day, which water is being

disposed of in an unlined open pit located in the NE $\frac{1}{4}$ NW $\frac{1}{4}$  Section 2, Township 19 South, Range 31 East, N.M.P.M.

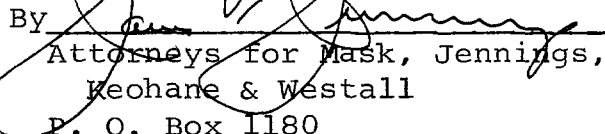
4. Applicants seek permission to dispose of the produced salt water produced from the above mentioned wells and other wells that applicants may drill upon their lease into open unlined pits located in the NE $\frac{1}{4}$ NW $\frac{1}{4}$  Section 2, Township 19 South, Range 31 East, N.M.P.M., or other portions of the lands embraced in said lease, 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, Applicants request that this application be set for hearing before the Commission or one of its examiners and that the Commission enter its Order granting Applicants an exception to Order R-3221, as amended, in accordance with this application.

JENNINGS & COPPLE

By   
Attorneys for Mask, Jennings,  
Keohane & Westall  
P. O. Box 1180  
Roswell, New Mexico 88201