

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

RECEIVED

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
DIVISION FOR THE PURPOSE OF
CONSIDERING THE APPLICATION OF
WOODBINE PETROLEUM, INC. FOR
AN EXCEPTION TO DIVISION ORDER
NO. R-3221, EDDY COUNTY, NEW
MEXICO

APR 11 1981
OIL CONSERVATION DIVISION

CASE NO. 10282

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted on behalf of
Woodbine Petroleum, Inc. as required by the Oil Conservation
Division.

APPEARANCES OF PARTIES

Applicant: Woodbine Petroleum, Inc.
1445 Ross Avenue
Dallas, Texas 75202
(214) 855-6262

Contact Person: Don G. Shackelford
Executive Vice President

Attorney: W. Perry Pearce
Montgomery & Andrews, P.A.
Post Office Box 2307
Santa Fe, New Mexico 87504
(505) 982-3873

APPLICANT'S STATEMENT OF THE CASE

Applicant in this case seeks an exception to Division Order
No. R-3221, as amended, to permit the disposal of produced water
into an unlined pit located in the SW/4SE/4 of Section 11,
Township 19 South, Range 31 East, N.M.P.M, Eddy County, New
Mexico.

APPLICANT'S PROPOSED EVIDENCE

Applicant expects to call one witness and present 10 or
fewer exhibits. The direct case should take 30 minutes or less.

PROCEDURAL MATTERS

Applicant is not aware of any procedural matters which need to be resolved prior to the hearing of this case.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By 

W. Perry Pearce
Post Office Box 2307
Santa Fe, New Mexico 87504-2307
(505) 982-3873

Attorneys for Woodbine Petroleum, Inc.

[WPP/187]