

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

93 MAR 24 AM 9 33

IN RE: THE APPLICATION OF DAVCRO INC.)
FOR ADMINISTRATIVE APPROVAL FOR)
AUTHORIZATION TO INJECT DISPOSAL WATER)

10717

**OBJECTION BY W. E. BILBREY TO
APPLICATION FOR SALT WATER DISPOSAL**

COMES NOW W. E. Bilbrey, H. C. 65, Box 40, Crossroads, New Mexico, 88114, and files his objection to the Division approving the Application of Davcro Inc. for authorization to inject salt water for disposal into the lower San Andres Formation in the Sawyer Deep No. 1 Well located 330 feet from the South line and 2,310 feet from the West line of Section 19, Township 9 South, Range 38 East, N.M.P.M., Lea County, New Mexico and, for grounds, states:

1.

That I am the owner in fee simple of the surface estate of the South Half of the Southwest Quarter (S/2SW/4) of Section 19, Township 9 South, Range 38 East, N.M.P.M., Lea county, New Mexico, upon which the Sawyer Deep No. 1 Well is situated. In addition, I also own in fee simple the surface estate of all of the rest of Section 19.

2.

That I received notice by mail of Davcro Inc.'s Application on March 19, 1993, in the form of a letter from Michael L. Pierce of Peak Consulting Services, with a copy of Davcro Inc.'s Application. This notice for disposal of produced water was the first notice I had

of Davcro Inc.'s Application. No one from Davcro Inc. has contacted me with respect to its Application.

3.

The Application of Davcro Inc. reflects an intention to inject an average daily volume of 500 barrels of salt water for disposal purposes into the Sawyer Deep No. 1 Well, with a maximum anticipated daily injection volume of 1,000 barrels. Further, the Application reflects an intention on the part of Davcro Inc. to dispose of salt water produced from Leases operated by Davcro Inc. and from San Andres production in the surrounding area. If the Application is approved, Applicant apparently intends to conduct a commercial disposal well operation for the public. I object to the disposal of any produced water into the Sawyer Deep No. 1 Well the source of which water is produced off of the Lease where the Sawyer Deep No. 1 Well is located, regardless of whether this produced water is to be transported by pipeline or by tank truck for disposal into the Sawyer Deep No. 1 Well. Applicant has no agreement with me and has not attempted to secure my consent or approval for Applicant to dispose of produced water not produced on the Lease where the Sawyer Deep No. 1 Well is located. Applicant has no right to dispose of produced water produced from a Lease other than the Lease where the Sawyer Deep No. 1 Well is located, unless Applicant first enters into an agreement with me where Applicant obtains authority to use my surface land and the surface pad of the location around the Well to conduct its disposal operation.

WHEREFORE, I, W. E. Bilbrey, object to the issuance of a permit to Davcro Inc. as requested in its Application and request the Division to schedule a hearing in this matter prior to taking any administrative action.

W. E. Bilbrey, Pro Se
H. C. 65, Box 40
Crossroad, New Mexico 88114
Telephone: 505-398-6226

CERTIFICATE OF SERVICE

I hereby certify that on the 26 day of March, 1993, I mailed by first class mail, with postage prepaid, a true copy of the foregoing Objection of W. E. Bilbrey to **Michael L. Pierce** of Peak Consulting Services, Post Office Box 636, Hobbs, New Mexico, 88241.

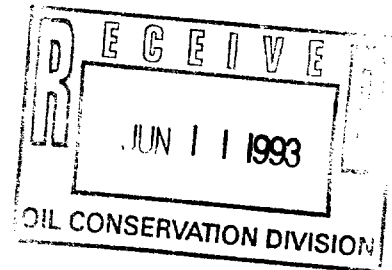
W. E. Bilbrey
W. E. Bilbrey

**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 PURPOSE OF
CONSIDERING:

CASE NO. 10717

APPLICATION OF DAVCRO INC.
FOR SALT WATER DISPOSAL,
LEA COUNTY, NEW MEXICO.



PRE-HEARING STATEMENT

This Prehearing Statement is submitted by Campbell, Carr, Berge & Sheridan, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Davcro Inc. _____
c/o Michael Pierce _____
Post Office Box 636 _____
Hobbs, New Mexico 88240
(505) 392-1915 _____
name, address, phone and
contact person

ATTORNEY

William F. Carr, Esq. _____
Campbell, Carr, Berge & Sheridan, P.A.
Post Office Box 2208 _____
Santa Fe, New Mexico 87504 _____
(505) 988-4421 _____

OPPOSITION OR OTHER PARTY

name, address, phone and
contact person

ATTORNEY

STATEMENT OF CASE

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

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OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

Mike Pierce, Geologist

15 Min.

Approximately 3

OPPOSITION

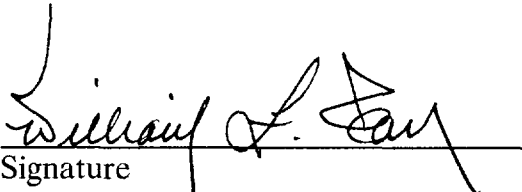
WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

(Please identify any procedural matters which need to be resolved prior to hearing)


Signature

CAMPBELL, CARR, BERGE
& SHERIDAN, P.A.
LAWYERS

MICHAEL B. CAMPBELL
WILLIAM F. CARR
BRADFORD C. BERGE
MARK F. SHERIDAN
WILLIAM P. SLATTERY

PATRICIA A. MATTHEWS
MICHAEL H. FELDEWERT
DAVID B. LAWRENZ

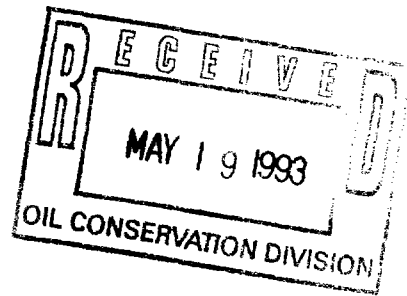
JACK M. CAMPBELL
OF COUNSEL

JEFFERSON PLACE
SUITE 1 - 110 NORTH GUADALUPE
POST OFFICE BOX 2208
SANTA FE, NEW MEXICO 87504-2208
TELEPHONE: (505) 988-4421
TELECOPIER: (505) 983-6043

May 17, 1993

HAND-DELIVERED

William J. LeMay, Director
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
State Land Office Building
Santa Fe, New Mexico 87503



Re: Oil Conservation Division Case No. 10717:
Application of Davcro Inc. for Salt Water Disposal, Lea County, New Mexico

Dear Mr. LeMay:

Davcro Inc. respectfully requests that this matter which is currently set on the Division docket for the May 20, 1993 hearings be continued to the June 17, 1993 Examiner docket.

Your attention to this matter is appreciated.

Very truly yours,

A handwritten signature in black ink, appearing to read 'William F. Carr'. The signature is written in a cursive, flowing style.

WILLIAM F. CARR

WFC:mlh

cc: Mr. Michael Pierce

CAMPBELL, CARR, BERGE
& SHERIDAN, P.A.
LAWYERS

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WILLIAM F. CARR
BRADFORD C. BERGE
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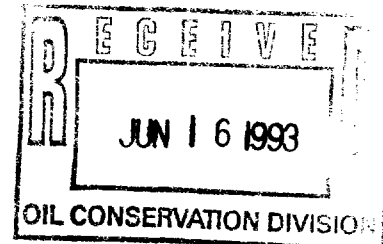
DC

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June 16, 1993

HAND-DELIVERED

William J. LeMay, Director
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
State Land Office Building
Santa Fe, New Mexico 87503



Re: Oil Conservation Division Case No. 10717
Application of Davcro Inc. for Salt Water Disposal, Lea County, New Mexico

Dear Mr. LeMay:

Davcro Inc. respectfully requests that this matter which is currently set on the Division docket for the June 17, 1993 hearings be continued to the July 1, 1993 Examiner docket.

Your attention to this matter is appreciated.

Very truly yours,

A handwritten signature in cursive script, appearing to read "William F. Carr".

WILLIAM F. CARR
WFC:mlh

cc: Michael Pierce

CAMPBELL, CARR, BERGE
& SHERIDAN, P.A.
LAWYERS

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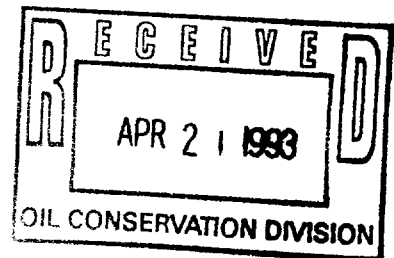
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TELEPHONE: (505) 988-4421
TELECOPIER: (505) 983-6043

April 21, 1993

ms.

HAND-DELIVERED

William J. LeMay, Director
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
State Land Office Building
Santa Fe, New Mexico 87503



Re: Oil Conservation Division Case No. 10717:
Application of Davcro Inc. for Salt Water Disposal, Lea County, New Mexico

Dear Mr. LeMay:

Davcro Inc. respectfully requests that this matter which is currently set on the Division docket for the April 22, 1993 hearings be continued to the May 20, 1993 Examiner docket.

Your attention to this matter is appreciated.

Very truly yours,

William F. Carr
WILLIAM F. CARR

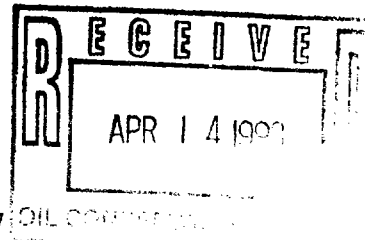
WFC:mlh

cc: Mr. Michael Pierce

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IN THE MATTER OF THE HEARING
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as required by the Oil Conservation Division.

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Post Office Box 636 _____
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(505) 392-1915 _____
name, address, phone and
contact person

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STATEMENT OF CASE

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

Davcro Inc., applicant in the above-captioned cause, seeks authority to re-enter the previously plugged and abandoned Cactus Drilling Corporation Sawyer Deep Well No. 1 located 330 feet from the South line and 2310 feet from the West line (Unit N) of Section 19, Township 9 South, Range 38 East, and utilize said well to dispose of produced salt water into the Sawyer-Ann Andres Associated Pool through the open-hole interval from approximately 5120 feet to 5600 feet.

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PROPOSED EVIDENCE

APPLICANT

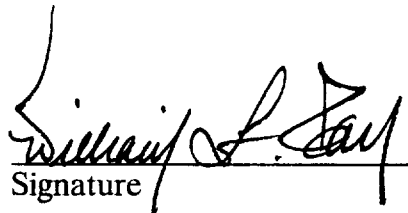
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Mike Pierce, Geologist	15 Min.	Approximately 3

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PROCEDURAL MATTERS

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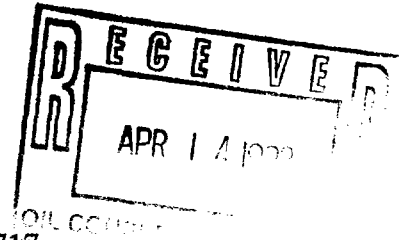


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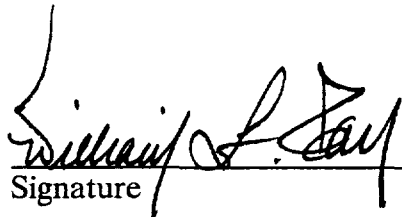
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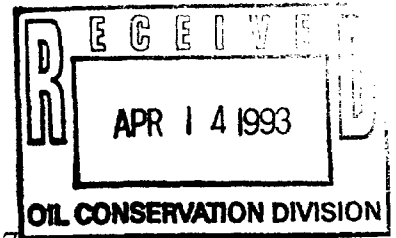
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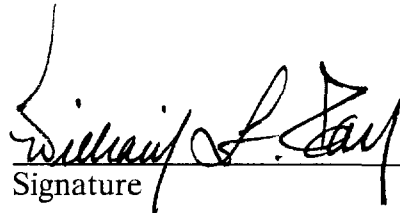
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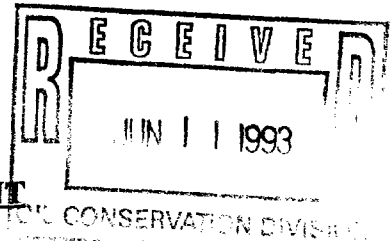

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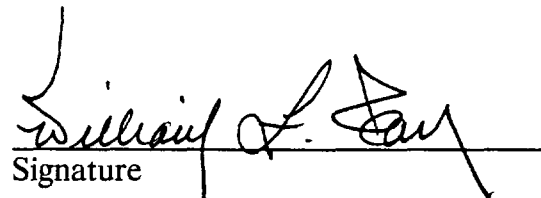
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