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OIL CONSERVATION DIV.  
SANTA FE

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. 9971

APPLICATION OF CONOCO, INC. FOR  
APPROVAL OF TWO SALT WATER DISPOSAL  
WELLS, LEA COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by  
KELLAHIN, KELLAHIN & AUBREY as required by the Oil  
Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

(name, address, phone  
and contact person)

Conoco, Inc.  
10 Desta Drive West  
Midland, Texas 79705  
Attn: Mr. Jerry Hoover  
(915) 686-5400

ATTORNEY

W. Thomas Kellahin  
Kellahin, Kellahin & Aubrey  
P.O. Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285

OPPOSITION OR OTHER PARTY  
(name, address, phone  
and contact person)

ATTORNEY

Pre-hearing Statement  
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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.)

Conoco, Inc. seeks authority to dispose of water produced from the Warren McKee Waterflood in the Warren McKee Pool into the San Andres formation in its Southeast Monument Unit Wells No. 99 and 101, within the interior of said unit.

### 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
Jerry Hoover (petroleum engineer)	40 min.	C-108 and attachments Geologic data

OPPOSITION

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
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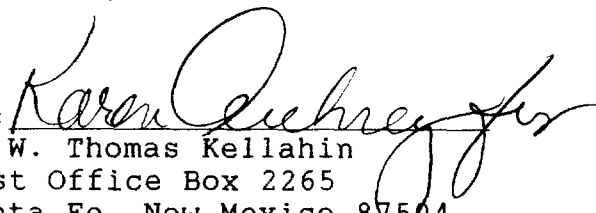
**PROCEDURAL MATTERS**

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

None.

KELLAHIN, KELLAHIN & AUBREY

By:

  
W. Thomas Kellahin

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