

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

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AUG 17 1990

OIL CONSERVATION DIV.
SANTA FE

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, LEA COUNTY,
NEW MEXICO

Case No. 10053

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 appears before the Division seeking authorization to dispose of water produced in conjunction with oil and gas production into an unlined pit located in the NE1/4 of the SW1/4, Section 21, T. 19 S., R. 32 E., NMPM, Lea County, New Mexico. Applicant estimates that this pit would receive approximately 320 barrels of water per day from six wells on the Amoco Federal Lease and the Mobil Federal Lease. Applicant is aware that there are other surface disposal pits in the vicinity of the proposed location which have been previously approved by the Division.

APPLICANT'S PROPOSED EVIDENCE

Applicant expects to call one witness, Mr. Don G. Shackelford, who will present approximately 10 exhibits and it is expected that the direct presentation of this matter will require approximately 30 minutes.

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



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Attorneys for Woodbine Petroleum Inc.

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