



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONEY ANAYA
GOVERNOR

December 1, 1986

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

Mr. Scott Hall
Campbell & Black
Attorneys at Law
Post Office Box 2208
Santa Fe, New Mexico

Re: CASE NO. 8974
ORDER NO. R-8347

Applicant:

Geo Engineering, Inc.

Dear Sir:

Enclosed herewith are two copies of the above-referenced
Division order recently entered in the subject case.

Sincerely,

R. L. STAMETS
Director

RLS/fd

Copy of order also sent to:

Hobbs OCD x
Artesia OCD x
Aztec OCD x

Other Bruce Stockton, Alfred Dehiya

BEFORE THE
OIL CONSERVATION DIVISION
NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS



IN THE MATTER OF THE APPLICATION
OF GEO ENGINEERING, INC. FOR
EXCEPTION TO GENERAL RULES 104(F)
AND 104(C)(1), MCKINLEY COUNTY,
NEW MEXICO.

Case Nos. 8974, 8932 and 8933

INTERROGATORIES

Applicant, GEO Engineering, Inc., propounds the following Interrogatories to the Navajo Nation, to be entered in writing, under oath, within fifteen (15) days from the date hereof.

INTERROGATORY 1: State the name, address, and authority of the person or persons supplying information to be used in answering these Interrogatories.

ANSWER:

INTERROGATORY 2: Please state whether or not the Navajo Nation has seen or intends to be represented in the instant proceeding by a duly licensed New Mexico attorney. If you answer in the affirmative, please state the attorney's name, address, telephone number and the date his or her appearance was entered.

ANSWER:

INTERROGATORY 3: Please state with specific detail the mineral interest or interests which the Navajo Nation alleges to be affected by this proceeding.

ANSWER:

INTERROGATORY 4: Please state with specific detail the type of interest the Navajo Nation has in any of the surface lands covering the application area in this proceeding. (Please identify the interest by type and legal description).

ANSWER:

INTERROGATORY 5: Please state whether or not the Navajo Nation opposes the Application for Exception to Oil Conservation Division Rules 104(C)(1) and 104(F). If your answer is in the affirmative, please state the reason for opposition.

ANSWER

INTERROGATORY 6: Please state what efforts have been made, if any, to notify the applicant of the Navajo Nation's objections to the application, the reasons therefore and when those objections were made.

ANSWER:

INTERROGATORY 7: Please state whether the Navajo Nation intends to offer any geologic, engineering, or economic evidence at the hearing on this matter. If your answer is in the affirmative, please identify each witness through whom such evidence will be offered, their job title, address and telephone number.

ANSWER:

INTERROGATORY 8: Please state the name, job title, address and telephone number of each and every witness you intend to call to testify at the hearing on this matter. Please state in detail the nature and substance of each witnesses testimony.

ANSWER:

INTERROGATORY 9: Please state in detail the contents of any and all exhibits which you intend to offer into evidence at the hearing on this matter.

ANSWER:

Respectfully submitted:

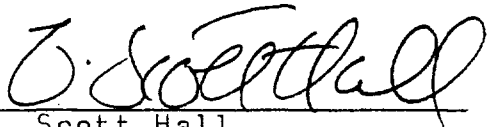
CAMPBELL & BLACK, P.A.

By 
J. Scott Hall

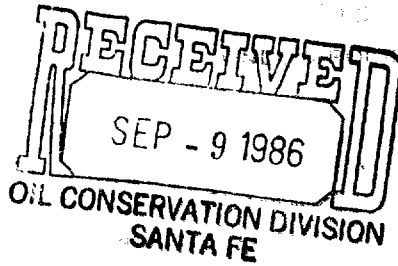
P.O. Box 2208
Santa Fe, NM 87504-2208
(505) 988-4421

Attorneys for Applicant,
GEU Engineering, Inc.

I hereby certify that I mailed
the original of the foregoing
pleading to Richie Nez, Esq.,
Navajo Nation, P.O. Drawer 2010
Window Rock, Arizona 86515 on
the 30th day of September, 1986.

A handwritten signature in cursive script, appearing to read "J. Scott Hall", written over a horizontal line.

J. Scott Hall



David R. Catanach, Hearing Examiner
Oil Conservation Division
Post Office Box 2088
Santa Fe, New Mexico 87504-2088

September 03, 1986

RE: Case Nos. 8974, 8932 and 8933

Dear Mr. Catanach:

As mentioned yesterday by telephone, I have been assigned to represent the Navajo Nation's interest in the above docketed cases. It is the desire of the Navajo Nation that the above docketed cases be reopened and that the Nation be given an opportunity to show cause why Geo Engineering should not be given approval for additional well locations.

Additionally, please schedule a hearing date to be held on October 15, 1986.

Thank you for your attention to this very important matter. Please call me at (602) 871-4941, extensions 1401 through 1405 or in care of the Navajo Nation, Office of Navajo Land Administration, Post Office Box 308, Window Rock, Arizona 86515.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Richie Nez".

Richie Nez
Attorney at Law

cc: Charles Damon, Executive Director, Division of Resources
Alfred Dehiya, Deputy Director, Division of Resources
Melvin Bautista, Director, Office of Navajo Land Administration
Ninibah M. Cahn, Supervisor, Title, Records & Appraisal Section/ONLA
Case Files

Chrono File #1, 1986/ONLA at Title, Records & Appraisal Section
Disk: DEB(Ltr. to David R. Catanach)

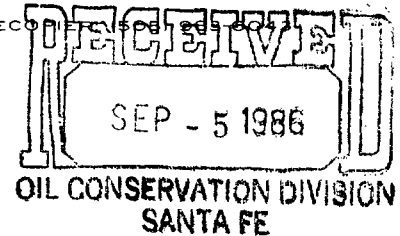
CAMPBELL & BLACK, P.A.
LAWYERS

JACK M. CAMPBELL
BRUCE D. BLACK
MICHAEL B. CAMPBELL
WILLIAM F. CARR
BRADFORD C. BERGE
J. SCOTT HALL
PETER N. IVES
JOHN H. BEMIS

GUADALUPE PLACE
SUITE 1 - 110 NORTH GUADALUPE
POST OFFICE BOX 2208
SANTA FE, NEW MEXICO 87504-2208

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

September 2, 1986



Mr. Frank Chavez
Area Supervisor
Oil Conservation Division
1000 Rio Brazos
Aztec, New Mexico 87410

Re: Geo Engineering, Inc.

Dear Frank:

I am in receipt of Supplement to the Oil Proration Schedule No. 3055/X dated August 11, 1986 but mailed to Geo Engineering, Inc. on August 25, 1986. The schedule indicates that the allowables for Geo Engineering, Inc. wells in the Chaco Wash Mesaverde Pool in McKinley County have been cancelled for failure to file the Operators Monthly Report.

It is my understanding that all past due C-115's were filed by Geo Engineering with the Santa Fe office on August 20, 1986. I am unaware if copies of those filings were made available to the District Office in Aztec.

In any event, I understand that Geo Engineering is now current on its C-115 filings. Accordingly, we would request that the allowables for Geo Engineering's wells in the Chaco Wash Mesaverde Pool be reinstated. If for some reason the reinstatement is not possible, I would appreciate your advising me why such is not possible.

Very truly yours,


J. Scott Hall

JSH/ba

cc: R. L. Stamets, Director✓
Oil Conservation Division
Geo Engineering, Inc.