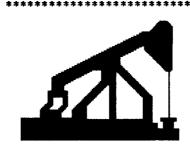
# LANEXCO, INC.

P. O. BOX 2730 MIDLAND, TEXAS 79702 915/687-5047 FAX 915/687-5048

ADMINISTRATION
Tommy Phipps
Ric Flores



\*QLCONSER P. O! BOX 1\$268 JALP NEW MEXICO 88252 505/395-3056 '91 AUG 22 FARIFO 93994205

OPERATIONS
Robert Lansford
Mike Copeland
Susan Chacon

August 21, 1991

10395

Oil Conservation Division P.O. Box 2088 Santa Fe, New Mexico 87501

Re: Hal J. Rasmussen Operating, Inc. Application for Authorization to Inject.

Salt Water Disposal Well located 660' FSL & 1980 FEL of Section 16 T 23S R 36 E Lea County, NM. Seven Rivers Formation 3260' - 3269' Approx 500,000 BWPD at 0# psi.

Dear Sir:

Lanexco Inc. as an offset operator to the above referenced well respectfully protests authorization of such well and requests a formal hearing with the Oil Conservation Division.

Your attention on this matter will be greatly appreciated.

If you have any questions please advise. Thank you.

Very truly your

Robert W. Lansford
Executive Vice President

RWL/bc

cc:

Mr. Scott Casey
Hal L. Rasmussen Operati

Hal J. Rasmussen Operating, Inc. Six Desta Drive, Suite 2700 Midland, Texas 79705

DRILLING ENGINEERING OPERATING

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

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF HAL J. RASMUSSEN OPERATING INC. FOR SALT WATER DISPOSAL, LEA COUNTY, NEW MEXICO.

Case No. 10,395

M.S.

#### PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Applicant as required by the Oil Conservation Division.

#### APPEARANCES OF PARTIES

#### APPLICANT

Hal J. Rasmussen Operating, Inc. 6 Desta Drive, Suite 5850 Midland, Texas 79705 (915) 687-1664 Attention: Dennis Moore

#### ATTORNEY

James Bruce
Hinkle, Cox, Eaton,
Coffield & Hensley
500 Marquette, N.W.
Suite 800
Albuquerque, N.M. 87102

#### OPPOSITION OR OTHER PARTY

ATTORNEY

Applicant has been notified that this case may be opposed.

#### STATEMENT OF CASE

#### APPLICANT

Applicant seeks authority to dispose produced salt water into the Jalmat Pool in its Mobil State Well No. 1.

#### OPPOSITION OR OTHER PARTY

Pre-hearing Statement NMOCD Case No. 10,395 Page 2

#### PROPOSED EVIDENCE

#### APPLICANT

WITNESS EST. TIME EXHIBITS (Name and expertise)

Dennis Moore (Engineer)

30 minutes

(a) C-108.

(b) Notice letters.

#### **OPPOSITION**

WITNESSES

EST. TIME

**EXHIBITS** 

#### PROCEDURAL MATTERS

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

Respectfully Submitted,

HINKLE, COX, EATON, COFFIELD &

HENSLEY

₽Y\_

James Bruce 500/Marquette, N.W.

Suite 800

Albuquerque, New Mexico 87102 (505) 768-1500

Attorneys for Rasmuesson Operating Company

2



# HINKLE, COX, EATON, COFFIELD & HENSLEY

SOO MARQUETTE NW, SUITE 800
ALBUQUERQUE, NEW MEXICO 87102

TELEPHONE: (505) 768-1500

TELECOPIER: (505) 768-1529

## TELECOPIER LEAD SHEET

	PLEASE DELIVER THE FOLLOWING DOCUMENT
TO:	Oil Conservation Division
COMPANY:	
TELECOPIER:	(505) 827-5741
TOTAL PAGES:	3 pg5 (INCLUDING THIS COVER SHEET)
FROM:	James Bruce
OPERATOR:	LE C/M#: Office
	$\mathcal{O}_{\mathcal{V}}$
MESSAGE(S):	HEREWITH THE FOLLOWING:
PLEASE CALL:	( ) TO CONFIRM RECEIPT ( ) AFTER REVIEW
()	
	CONFIRMATION
BY:	WITH:
DATE:	TIME:

(Flev. 8/90)

#### Charles W. Kemp 1701 E. Highland Hobbs, New Mexico 88240

September 25, 1991

Oil Conservation Division P.O. Box 2088 Santa Fe, New Mexico 87501

Hal J. Rasmussen Operating Inc. Application for Authorization to Inject Salt Water Disposal Well located 660' FSL & 1980' FEL of Sec 16T 23S 36E Lea County, NM Seven Rivers Formation 3260'-3269'

Dear Sir:

Charles W. Kemp respectfully protests authorization of this disposal well. This well would be located in the SE4 of Sec 16. We have two wells located in the SW4 of Sec 15. The Stevens B-15 #3 is perforated in this zone and the Stevens B-15 #2 is an open hole completion in this zone. We also have doubts about the integrity of the casing and the cement behind the casing.

For these reasons I protest this authorization and I appreciate your consideration.

Sincerely,

Charles W. Kemp

Charles W. Kemp

Operator

### HINKLE, COX, EATON, COFFIELD & HENSLEY/ED

ATTORNEYS AT LAW

SOO MARQUETTE N.W., SUITE \$1 00 17

700 UNITED BANK PLAZA POSTOFFICE BOX 10
ROSWELL, NEW MEXICO BB202

(505) 622-6510 FAX (505) 623-9332

LEWIS C COX
PAUL W EATON
CONRAD E COFFIELD
HAROLD L HENSLEY, JR
STUART D SHANOR
ERIC D LANPHERE
C D. MARTIN
PAUL J KELLY, JR
MARSHALL G. MARTIN
OWEN M LOPEZ
DOUGLAS L LUNSFORD DOUGLAS L. LUNSFORD JOHN J. KELLY CALDER EZZELL JR.

T CALDER EZZELL, JR.
WILLIAM B. BURFORD\*
RICHARD E. OLSON
RICHARD R. WILFONG\*
THOMAS J. MCBRIDE
STEVEN D. ARNOLD
JAMES J. WECHSLER
NANCY S. CUSACK
JEFFREY D. HEWETT
JAMES BRILICF JAMES BRUCE JERRY F SHACKELFORD\* JEFFREY W HELLBERG\* ALBERT L. PITTS THOMAS M HNASKO JOHN C. CHAMBERS\* GARY D. COMPTON\* MICHAEL A. GROSS

THOMAS D HAINES, JR THOMAS D HAINES, JR
FRANKLIN H MCCALLUM\*
GREGORY J HIBERT
DAVID T MARKETTE\*
MARK C DOW
KAREN M. RICHARDSON\*
FRED W SCHWENDIMANN
JAMES M. HUDSON
JEFFREY S BAIRD\*
PATRICIA A MORRIS
MACDONNELL GOBOON MACDONNELL GORDON REBECCA NICHOLS JOHNSON WILLIAM P. JOHNSON

STANLEY K. KOTOVSKY, JR. BETTY H LITTLE\*
RUTH S MUSGRAVE
HOWARD R THOMAS
ELLEN S. CASEY
S BARRY PAISNER
MARGARET CARTER LUDEWIG
MARTIN MEYERS
GREGORY S. WHEELER
ANDORW. LC OLUTER ANDREW J. CLOUTIER JAMES A. GILLESPIE GARY W. LARSON STEPHANIE LANDRY JOHN R. KULSETH, JR. LISA K. SMITH\*

JAMES K SCHUSTER\*

ALBUQUERQUE, NEW MEXICO 87102-2121

(505) 768-1500

FAX (505) 768-1529

OF COUNSEL
O M CALHOUN\*
MACK EASLEY
JOE W WOOD
RICHARD S. MORRIS

CLARENCE E. HINKLE (1901-1985) W. E. BONDURANT, JR. (1913-1973) ROY C. SNODGRASS, JR. (1914-1987)

October 14, 1991

2800 CLAYDESTA NATIONAL BANK BUILDING POST OFFICE BOX 3580 MIDLAND, TEXAS 79702 (915) 683-4691 FAX (915) 683-6518

> 1700 TEAM BANK BUILDING POST OFFICE BOX 9238 AMARILLO, TEXAS 79105 (806) 372-5569 FAX (806) 372-9761

218 MONTEZUMA POST OFFICE BOX 2068 SANTA FE. NEW MEXICO 87504 (505) 982-4554 FAX (505) 982-8623

\*NOT LICENSED IN NEW MEXICO

Mr. William Lemay New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87504

Re: Case No. 10,395, The Application of Hal J. Rasmussen Operating, Inc. for Salt Water Disposal, Lea County, New Mexico

Dear Mr. Lemay:

The above matter had been readvertised for the Thursday, October 17, 1991 hearing. Please continue this matter to the October 31,1991 hearing. At the examiner's request, we have been gathering additional data, and we need the extra two weeks in order to submit all the data requested by the examiner. you.

Very truly yours,

HINKLE, COX, EATON, COFFIELD &

HENSLEY

James Bruce

JB:le

## HINKLE, COX, EATON, COFFIELD & HENSLEY DIVISION

ATTORNEYS AT LAW

ALBUQUERQUE, NEW MEXICO 87102-2121 POST OFFICE BOX 10

REGE ZED

FAX (505) 623-9332

700 UNITED BANK PLAZA

(505) 768-1500 FAX (505) 768-1529

OF COUNSEL
O. M. CALHOUN\*
MACK EASLEY
JOE W. WOOD

CLARENCE E. HINKLE (190H985) W E. BONDURANT, JR. (1913-1973) ROY C. SNODGRASS, JR. (1914-1987)

October 30, 1991

2800 CLAYDESTA NATIONAL BANK BUILDING POST OFFICE BOX 3580 MIDLAND, TEXAS 79702 (915) 683-4691 FAX (915) 683-6518

> 1700 TEAM BANK BUILDING POST OFFICE BOX 9238 AMARILLO, TEXAS 79105 (806) 372-5569 FAX (806) 372-9761

218 MONTEZUMA POST OFFICE BOX 2068 SANTA FE. NEW MEXICO 87504 (505) 982-4554 FAX (505) 982-8623

\*NOT LICENSED IN NEW MEXICO

LEWIS C COX
PAUL W. EATON
CONRAD E COFFIELD
HAROLD L. HENSLEY, JR
STUART D. SHANOR
ERIC D. LANPHERE
C. D. MARTIN
PAUL J. KELLY JR
MARSHALL G. MARTIN
OWEN M. LOPEZ
DOUGLAS L. LUNSFORD
JOHN J. KELLY
T. CALDER EZZELL, JR.
WILLIAM B. BURFORD
RICHARD R. OLLSON
RICHARD R. WILEDONO\*
THOMAS J. MEBRIDE

THOMAS J. MCBRIDE STEVEN D. ARNOLD

STEVEN D. ARNOLD JAMES J. WECHSLER NANCY S. CUSACK JEFFREY L. FORNACIARI JEFFREY D. HEWETT JAMES BRUCE JERRY F. SHACKELFORD-JEFFREY W. HELLBERG\*ALBERT L. PITTS THOMAS M. HNASKO JOHN C. CAMABERS\*

JOHN C. CHAMBERS' GARY D. COMPTON'

MICHAEL A. GROSS

Mr. Michael E. Stogner Oil Conservation Division 310 Old Santa Fe Trail, Room 206 Santa Fe, New Mexico 87501

Case No. 10,395, The Application of Hal J. Rasmussen Re: Operating, Inc. for Salt Water Disposal, Lea County, New Mexico

Dear Mr. Stogner:

THOMAS D. HAINES, JR. FRANKLIN H. MCCALLUM\* GREGORY J. NIBERT

GREGORY J NIBERT
DAVID T. MARKETTE\*
MARK C. DOW
KAREN M. RICHARDSON\*
FRED W SCHWENDIMANN
JAMES M. HUDSON
JEFFREY S. BAIRD\*
PATRICIA A. MORRIS
MACDONNELL GORDON
REBECCA NICHOLS JOHNSON
WILLIAM P. JOHNSON

STANLEY K. KOTOVSKY, JR BETTY H. LITTLE\*

MARTIN MEYERS

MARTIN MEYERS
GREGORY S. WHEELER
ANDREW J. CLOUTIER
JAMES A GILLESPIE
GARY W. LARSON
STEPHANIE LANDRY
JOHN R. KULSETH, JR.

LISA K. SMITH\*

JAMES K. SCHUSTER\*

BETTY H. LITTLE\*
RUTH S. MUSGRAVE
HOWARD R. THOMAS
ELLEN S CASEY
S. BARRY PAISNER
MARGARET CARTER LUDEWIG

As you requested at the hearing, enclosed are the following:

- An Affidavit Regarding Notice to the offset operators. This notice was testified to by the witness, Dennis Moore, but Mr. Stovall requested that it be put in Affidavit form.
- An Affidavit Regarding Notice to the Commissioner of Public Lands (the surface owner). Notice was given to the Commissioner in September 1991, but it was not sent by certified Therefore, the Commissioner was renotified of the hearing by certified mail.
- Exhibit No. 1 from the hearing, which has been amended to code the Yates, Seven Rivers, and Queen wells in Sections 8, 9, 10, 15, 16, 17, 20, 21, and 22 to represent the formations or pools each well is producing from. In addition, there is a cover letter from the Applicant discussing Lanexco's well in Section 22.

Please call me if you need anything further on this matter.

Very truly yours,

HINKLE, COX, EATON, COFFIELD &

HENGLEY -

WWW. Bruće By:

JB: le

HINKLE, COX, EATON, COFFIELD HENSLEY

ATTORNEYS AT LAW

THOMAS D. HAINES, JR. FRANKLIN H. MCCALLUM\* GREGORY J. NIBERT DAVID T. MARKETTE\* MARK C. DOW KAREN M. RICHARDSON FRED W. SCHWENDIMANN
JAMES M. HUDSON
JEFFREY S. BAIRD\*
PATRICIA A. MORRIS

STUART D. SHANOR
ERIC D. LANPHERE
C. D. MARTIN
PAUL J KELLY, JR.
MARSHALL G MARTIN
OWEN M. LOPEZ
DOUGLAS L. LUNSFORD MACDONNELL GORDON REBECCA NICHOLS JOHNSON WILLIAM P. JOHNSON

STANLEY K. KOTOVSKY, JR.
BETTY H. LITTLE\*
RUTH S. MUSGRAVE
HOWARD R. THOMAS
ELLEN S. CASEY
S. BARRY PAISNER
MARGARET CARTER LUDEWIG
MARTIN MEYERS
GREGORY S. WHEELER
ANDREW J. CLOUTIER
JAMES A. GILLESPIE
GARY W. LARSON
STEPHANIE LANDRY STEPHANIE LANDRY JOHN R. KULSETH, JR LISA K. SMITH\* JAMES K. SCHUSTER\*

ALBUQUERQUE, NEW MEXICO 87102-2121 POST OFFICE BOX 10
ROSWELL, NEW MEXICO 88202
(505) 622-6510

(505) 768-1500

FAX (505) 768-1529

CLARENCE E. HINKLE (1901-1985) ROY C SNODGRASS JR (1914-1987)

November 19, 1991

700 UNITED BANK PLAZA POST OFFICE BOX IO FAX (505) 623-9332

2800 CLAYDESTA NATIONAL BANK BUILDING POST OFFICE BOX 3580 MIDLAND, TEXAS 79702 (915) 683-4691 FAX (915) 683-6518

> 1700 TEAM BANK BUILDING POST OFFICE BOX 923B AMARILLO, TEXAS 79105 (806) 372-5569 FAX (806) 372-9761

218 MONTEZUMA POST OFFICE BOX 2068 SANTA FE. NEW MEXICO 87504 (505) 982-4554 FAX (505) 982-8623

\*NOT LICENSED IN NEW MEXICO

LEWIS C COX

JOHN J. KELLY

PAUL W EATON
CONRAD E. COFFIELD
HAROLD L. HENSLEY, JR.
STUART D. SHANOR

T. CALDER EZZELL, JR.

T. CALDER EZZELL JR WILLIAM B BURFORD\* RICHARD E OLSON RICHARD R. WILFONG\* THOMAS J. MCBRIDE STEVEN D. ARNOLD JAMES J. WECHSLER NANCY S. CUSACK JEFFREY L. FORNACIARI JEFFREY D. HEWETT JAMES BRUCE JERRY F. SHACKELFORD\*

JAMES BRUCE JERRY F. SHACKELFORD\* JEFFREY W. HELLBERG\* ALBERT L. PITTS THOMAS M. HNASKO

D COMPTON

MICHAEL A. GROSS

Mr. Michael E. Stogner New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87504

Case No. 10,395, The Application of Hal J. Rasmussen Operating, Inc. for Salt Water Disposal, Lea County, New Mexico

Dear Mr. Stogner:

This matter was taken under advisement at the November 5, 1991 hearing. There was a question as to whether the information you requested at hearing had been received by the Division. Enclosed is a copy of my letter to you dated October 30, 1991 with the requested information. If you need any of the documents mentioned in the letter, please let me know.

In addition, enclosed is a cross section which includes a Seven Rivers injection well (the McKenny No. 1), injecting 600 BWPD, offset by several Yates gas wells, without problem.

Very truly yours,

HINKLE, COX, EATON, COFFIELD &

HENSLEY -

By:

James Bruce

JB:le Enclosures

( ) HINKLE, COX, EATON, COFFIELD & HENSLEY

ATTORNEYS AT LAW

FRANKLIN H. MCCALLUM' GREGORY J. NIBERT BOO MARQUETTE N.W., SUITE 800 DAND T. MARKETTE\*
MARK C. DOW
KAREN M. RICHARDSON\*
FRED W. SCHWENDMANN
JAMES M. HUDBON
JEFFREY S. BAIRD\*
FATRICIA A. MORRIS
MACDONNELL GORDON
REBECCA NICHOLS JOHN
WILLIAM P. JOHNSON

ALBUQUERQUE, NEW MEXICO 87102-2121

(505) 768-1500

FAX (505) 768-1529

OF COUNSEL MACK EASLEY JOE W WOO!

CLARENCE E. HINKLE (800-1805) W.E. SONDURANT, JR. (803-1873) ROY C. SNODGRASS, JR. 8814-1987)

October 30, 1991

700 UNITED BANK PLAZA POST OFFICE BOX IO ROSWELL, NEW MEXICO 88202 (505) 622-6510 FAX (505) 623-9332

2800 CLAYDESTA NATIONAL BANK BUILDING POST OFFICE BOX 3580 MIDLAND, TEXAS 79702 (915) 683-469I FAX (915) 683-6518

> 1700 TEAM BANK BUILDING POST OFFICE BOX 9238 AMARILLO, TEXAS 79105 (806) 372-5569 FAX (806) 372-9761

218 MONTEZUMA POST OFFICE BOX 2068 SANTA FE. NEW MEXICO 87504 (505) 982-4554 FAX (505) 982-8623

\*NOT LICENSED IN NEW MEXICO

LEWIS C. COX
PAUL W EATON
CONRAD E. COFFIELD
MAROLD L. HEMSELY, JR.
STUART D. SHANOR
ENC D. LANPHERE
C. D. MARTIN
PAUL J. NELLY, JR.
MARSHALL G. MARTIN
OWEN M. LOPEZ
DOUGLAG E. LUNBERORD
JOHN J. NELLY
T. CALDER EZZELL, JR.
WILLIAM B. BURFORD

WILLIAM B. BURFORD' RICHARD E OLSON RICHARD R WILFONG'

ALBERT L. PITTS
THOMAS M. HINASKO
JOHN C. CHAMBERS\*
GARY D. COMPTON\*
MICHAEL A. GROSS

THOMAS D. HAMES, JR.

STANLEY K. KOTOVSKY, JR

BETTY H. LITTLE\*

GARY W LARSON STEPHANIE LANDRY JOHN R. KULSETH, JR.

LISA K. SMITH

STEVEN D. ARNOLD
JEFFREY L. FORNACIANI
JEFFREY L. FORNACIANI
JAMES STUCK
JAMES STUCK
JERRY F. SHACKLERG\*
JAMES STUCK
JEFFREY W. HELLBERG\*
JAMES A. GILLESPIE

Mr. Michael E. Stogner Oil Conservation Division 310 Old Santa Fe Trail, Room 206 Santa Fe, New Mexico 87501

Case No. 10,395, The Application of Hal J. Rasmussen Re: Operating, Inc. for Salt Water Disposal, Lea County, New Mexico

Dear Mr. Stogner:

As you requested at the hearing, enclosed are the following:

- An Affidavit Regarding Notice to the offset operators. This notice was testified to by the witness, Dennis Moore, but Mr. Stovall requested that it be put in Affidavit form.
- An Affidavit Regarding Notice to the Commissioner of Public Lands (the surface owner). Notice was given to the Commissioner in September 1991, but it was not sent by certified mail. Therefore, the Commissioner was renotified of the hearing by certified mail.
- Exhibit No. 1 from the hearing, which has been amended to code the Yates, Seven Rivers, and Queen wells in Sections 8, 9, 10, 15, 16, 17, 20, 21, and 22 to represent the formations or pools each well is producing from. In addition, there is a cover letter from the Applicant discussing Lanexco's well in Section

Please call me if you need anything further on this matter.

By:

Very truly yours,

HINKLE, COX, EATON, COFFIELD &

James Bruce

HENSLEY

JB:le

# State of New Mexico ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT Santa Fe, New Mexico 87505



BRUCE KING GOVERNOR ANITA LOCKWOOD CABINET SECRETARY MATTHEW BACA DEPUTY SECRETARY

January 22, 1992

HINKLE, COX, EATON, COFFIELD & HENSLEY Attorneys at Law 500 Marquette, NW Suite 740 Albuquerque, New Mexico 87102

RE: CASE NO. 10395

ORDER NO. R-9628

Dear Sir:

Enclosed herewith are two copies of each of the above-referenced Division orders recently entered in the subject cases.

Sincerely,

Florene Davidson OC Staff Specialist

FD/sl

cc:

BLM - Carlsbad Robert Lansford

Slovene Davidson

VILLAGRA BUILDING - 408 Galisteo

Forestry and Resources Conservation Division P.O. Box 1948 87504-1948 827-5830

Park and Recreation Division P.O. Box 1147 87504-1147 827-7465 2040 South Pacheco

Office of the Secretary 827-5950

Administrative Services 827-5925

Energy Conservation & Management

827-5900 Mining and Minerals 827-5970 LAND OFFICE BUILDING - 310 Old Santa Fe Trail

Oil Conservation Division P.O. Box 2088 87504-2088 827-5800

#### HAL J. RASMUSSEN OPERATING, INC.

SIX DESTA DRIVE, SUITE 2700 MIDLAND, TEXAS 79705 (915) 687-1664

October 24, 1991

New Mexico Oil Conservation Division State Land Office Building State of New Mexico

Attn: Michael E. Stogner

Re: El Paso State #1 22J 23S 36E

Dear Mr. Stogner:

I have reviewed the well that Mr. Lansford claims watered out his El Paso State #1. After reviewing the logs and scout tickets on the two wells, I think there is a reasonable explanation as to why the Conoco Shell-State #10 watered out Mr. Lansford's well.

First, note the injection interval on the Conoco water injection well. This is the log for the Shell-State JK #4. The top sand perforated at 3623 feet in what is commonly called the "I" sand in the bottom of the Seven Rivers Formation. This sand has anywhere from 100 to 500 md permeability and is the uppermost pay in the Langlie Mattix field. This sand is flooded, along with the Queen, in 90 percent of the wells located in Langlie Mattix water flood projects.

I had to use the log on the Shell State JK #2 in reference to Lanexco's El Paso State #1, because a log has not been released on Mr. Lansford's well. This well is only 300 feet away and is 10 feet lower structurally.

Note that when adjusted for depth, the El Paso State #1 is TD'd just in the top of the "I" sand. More than likely when Lanexco drilled out the shoe on this well it was communicated with the I sand. Very rarely is there good cement at the bottom of a shoe, anyway. Once Conoco started injecting into the "I" sand, the water communicated through this sand and watered out Mr. Lansford's well.

If Mr. Landsford set a bridge plug above the "I" sand, I believe his water problems would cease. If this were not the case, then either one or both wells do not have good cement behind the pipe. There is no other explanation why these wells would communicate, when they are completed in different zones.

Either way this should not effect our petition, because in the above case Lanexco's well is completed in the Seven Rivers and the Yates formations. In our case, Lanexco's well is producing only from the Yates and we propose to inject only into the Seven Rivers.

I hope this will help explain our case and I appreciate your consideration on this matter. If you have any questions or if I can be of further assistance, please don't hesitate to contact me.

Sincerely,

Hel J. Rasmussen

