



OIL CONSERVATION DIVISION

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C. Melvin Neal (1907-1968)  
J. W. Neal

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February 27, 1991

Mr. William J. LeMay, Director  
Oil Conversation Division  
Post Office Box 2088  
Santa Fe, New Mexico 87504-2088

*DUC*  
*JM*

Re: Oil Conservation Division Case 10233,  
Application of Mobil Producing Texas  
& New Mexico, Inc. for Saltwater Disposal

Dear Mr. LeMay:

Mobil Exploration advised us by memorandum the Division had requested a Pre-Hearing Statement. Please consider this letter as our Pre-Hearing Statement to the effect that the position of Protester is as outlined in the Objection heretofore filed. It is anticipated at this time that Mr. Larry C. Squires, on behalf of Snyder Ranches, will appear and testify. I do not anticipate that his testimony will be in excess of twenty to thirty minutes and the testimony will be in relation to the items set forth in the Protest.

Very truly yours,

NEAL & NEAL

By

J. W. Neal

JWN/sp  
cc: Larry C. Squires  
cc: W. Perry Pearce

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 THE APPLICATION OF  
MOBIL EXPLORATION & PRODUCING  
U.S., INC. FOR APPROVAL OF  
SALTWATER DISPOSAL, LEA COUNTY,  
NEW MEXICO.

Case No. 10233

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted on behalf of Mobil Exploration & Producing U.S., Inc. as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

Applicant: Mobil Exploration & Producing U.S., Inc.

Contact  
Person:

Dan Burnham  
Post Office Box 633  
Midland, Texas 79702  
(915) 688-2000

Attorney:

W. Perry Pearce  
Montgomery & Andrews, P.A.  
Post Office Box 2307  
Santa Fe, New Mexico 87504  
(505) 982-3873

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OIL CONSERVATION DIV.  
SANTA FE

APPLICANT'S STATEMENT OF THE CASE

Applicant is a party owning an interest in Section 27, Township 18 South, Range 35 East, N.M.P.M., Lea County, New Mexico. Applicant proposes to dispose of saltwater into its State 27 Well No. 1 located 660 feet from the north line and 1983 feet from the east line of Section 27, Township 18 South, Range 36 East. Applicant has filed an application in the form with the attachments prescribed by the Division and that application will be submitted as one of Mobil's exhibits at the hearing.

APPLICANT'S PROPOSED EVIDENCE

Applicant expects to call two witnesses at the hearing of this case and present 10 or fewer exhibits in support of its case. Applicant believes that its direct presentation in this case can be presented in 45 minutes or less.


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.

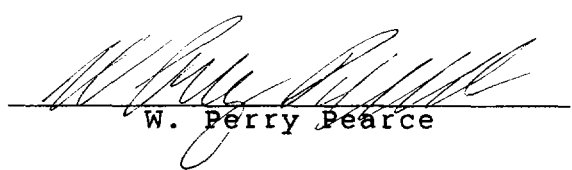
By

  
\_\_\_\_\_  
W. Perry Pearce  
Post Office Box 2307  
Santa Fe, New Mexico 87504-2307  
(505) 982-3873

Attorneys for Mobil Exploration &  
Producing U.S., Inc.

CERTIFICATE OF SERVICE

I certify that I had a copy of this Pre-Hearing Statement mailed to J. W. Neal, Esq., Post Office Box 278, Hobbs, New Mexico 88241 on March 1, 1991.

  
\_\_\_\_\_  
W. Perry Pearce

[WPP/91]