

**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:**

**APPLICATION OF CELERO ENERGY II, LP  
TO APPROVE THE EXPANSION OF THE  
DRICKEY QUEEN SAND UNIT AREA AND  
TO CONSOLIDATE SECONDARY RECOVERY  
PROJECTS WITHIN THE EXPANDED UNIT  
AREA, CHAVES COUNTY, NEW MEXICO.**

**No. 14,754**

**PRE-HEARING STATEMENT**

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

**APPEARANCES**

**APPLICANT**

Celero Energy II, L.P.  
Suite 1601  
400 West Illinois  
Midland, Texas 79701

Attention: John E. Lodge  
(432) 686-1883

**APPLICANT'S ATTORNEY**

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

**OPPONENT**

**OPPONENT'S ATTORNEY**

**STATEMENT OF THE CASE**

**APPLICANT**

Applicant seeks an order approving the expansion of the Drickey Queen Sand Unit Area, covering 7002.52 acres, to include 240.24 acres of land not originally within the unit area. The unit area, as expanded, contains 7242.76 acres of federal, state, and fee lands covering all or parts of 33-35, Township 13 South, Range 31 East, N.M.P.M., and Sections 1-5, 9-11, 14-16, and 22, Township 14 South, Range 31 East, N.M.P.M. Applicant further seeks the consolidation

of existing Division-approved secondary recovery projects covering the lands in the unit area, as expanded, into a single project for the Drickey Queen Sand Unit Area.

OPPONENT

**PROPOSED EVIDENCE**

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
John Lodge (landman)	10 min.	Approx. 3

**APPLICANT INTENDS TO PRESENT THIS CASE BY AFFIDAVIT.**

OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>

**PROCEDURAL MATTERS**

-None-

Respectfully submitted,



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Post Office Box 1056  
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(505) 982-2043

Attorney for Celero Energy II, L.P.