

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

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IN THE MATTER OF THE APPLICATION  
OF SUNDOWN ENERGY LP FOR  
AUTHORIZATION TO INJECT FOR  
WATERFLOOD PROJECT OPERATIONS,  
LEA COUNTY, NEW MEXICO.

CASE NO. 14983

PRE-HEARING STATEMENT

Sundown Energy LP provides this Pre-Hearing Statement as required by the rules of the  
Division.

**APPEARANCES**

APPLICANT

Sundown Energy LP

APPLICANT'S ATTORNEY

J. Scott Hall  
Montgomery & Andrews  
P.O. Box 2307  
Santa Fe, NM 87504-2307  
(505) 982-3873

OTHER PARTY

None

OTHER PARTY'S ATTORNEY

**STATEMENT OF THE CASE**

Applicant seeks approval to conduct waterflood operations to support production from its  
Bobbi State Waterflood Unit by converting the following wells to injection:

State of New Mexico W No. 2  
API No. 30-025-26605  
660' FNL and 660' FWL (Unit D)  
Section 28  
T-18-S, R-36-E, NMPM

Bobbi No. 4

API No. 30-025-27586  
1650' FSL and 990' FWL (Unit L)  
Section 20  
T-18-S, R-36-E, NMPM

**PROPOSED EVIDENCE**

SUNDOWN ENERGY

| <u>WITNESSES</u>                 | <u>EST. TIME</u> | <u>EXHIBITS</u> |
|----------------------------------|------------------|-----------------|
| Kyle Paxton, Landman             | 30 minutes       | 6               |
| Ross Pearson, Petroleum Engineer | 30 minutes       | 8               |

OTHER

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

**PROCEDURAL MATTERS**

Applicant requests that Case No. 14983 be consolidated with Case No. 14982 for the conduct of a single hearing.

Montgomery and Andrews, P.A.

By: \_\_\_\_\_

*J. Scott Hall*

J. Scott Hall, Esq.  
Post Office Box 2307  
Santa Fe, New Mexico 87504  
(505) 982-3873  
(505) 982-4289  
Attorneys for Sundown Energy LP

**Certificate of Service**

I hereby certify that a true and correct copy of the foregoing was served to counsel of record by electronic mail this \_\_\_\_\_ day of April, 2013.

N/A

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J. Scott Hall

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