

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

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

APPLICATION OF CHI OPERATING,  
INC. TO AMEND ORDER NO. R-13262,  
EDDY COUNTY, NEW MEXICO.

Case No. 15,019

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Chi Energy, Inc..  
P.O. Box 1799  
Midland, Texas 79702

Attention: John W. Qualls  
(432) 685-5001

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

Division Order No. R-13262, as amended, unitized all mineral interests in the Brushy Canyon member of the Delaware formation (Benson-Delaware Pool) underlying parts of Sections 1, 11, and 12, Township 19 South, Range 30 East, N.M.P.M., comprising 560.00 acres of federal lands, to form the Benson Delaware Unit. The order also approved an enhanced recovery project for the Benson Delaware Unit, and approved certain injection wells for the Benson Delaware Unit. Applicant requests that Division Order No. R-13262 be amended so that the Munchkin Well Nos. 14W, 16W, 17W, 18W, 19W, and 22W be deleted from the list of approved injection wells. Applicant requests that future injection wells within the Unit Area be approved administratively by the Division as provided in NMAC 19.15.26.8.A.

OPPONENT**PROPOSED EVIDENCE**APPLICANTWITNESSESEST. TIMEEXHIBITS

John W. Qualls  
(landman)

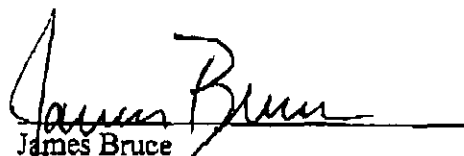
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**APPLICANT REQUESTS PERMISSION TO PRESENT ITS EVIDENCE BY  
AFFIDAVIT, SINCE THE RELIEF REQUESTED IS SIMPLE.**

OPPONENTWITNESSESEST. TIMEEXHIBITS**PROCEDURAL MATTERS**

Respectfully submitted,



James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Chi Operating, Inc.