

**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:**

CASE NO. 13750

**APPLICATION OF BP AMERICA PRODUCTION
COMPANY FOR APPROVAL OF A WATERFLOOD
PROJECT, EDDY COUNTY, NEW MEXICO.**

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

BP America Production Company
Attn: Mr. Jeffrey S. Hargrove
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Houston, Texas 77079
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ATTORNEY

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STATEMENT OF CASE

APPLICANT

Applicant in the above-styled cause, seeks approval of its Washington "33" State Lease Waterflood Project by injection of water into the Queen-Grayburg-San Andres formations, Artesia Queen-Grayburg-San Andres Pool through the following seven injection wells located in Section 33, Township 17 South, Range 28 East, NMPM:

Washington "33" State Well No. 2, 990' FNL & 930' FEL
Washington "33" State Well No. 4, 990' FNL & 2270' FEL
Washington "33" State Well No. 10, 2267' FNL & 1650' FWL

7/13/06

Washington "33" State Well No. 14, 2282' FNL & 970' FEL
Washington "33" State Well No. 16, 1500' FSL & 700' FEL
Washington "33" State Well No. 18 1550' FSL & 2511' FEL
Washington "33" State Well No. 23, 975' FSL & 1060' FWL

The applicant requests that the Division establish procedures for the administrative approval of additional injection wells within the project area without the necessity of further hearings and the adoption of any provisions necessary for such other matters as may be appropriate for said waterflood operations.

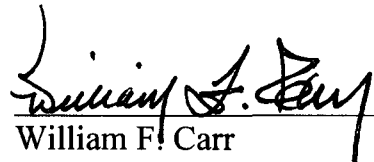
PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and Expertise)	ESTIMATED TIME	EXHIBITS
Jeffery S. Hargrove or Dodie Hecker (Petroleum/Reservoir Engineer)	Approx. 30 Minutes	Approx. 5

PROCEDURAL MATTERS

BP America Production Company has none at this time.



William F. Carr
Attorney for BP America Production
Company