

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

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APR 27 1995

Oil Conservation Division

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

CASE NO. 11278

APPLICATION OF TEXACO EXPLORATION
AND PRODUCTION INC., FOR
DOWNHOLE COMMINGLING,
LEA COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This Prehearing Statement is submitted by Campbell, Carr & Berge, P.A., as required
by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Texaco Exploration and Production Inc.
c/o Scott Elkington
Post Office Box 3109
Midland, TX 79702
(915) 688-4613

William F. Carr, Esq.
Campbell, Carr & Berge, P.A.
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

name, address, phone and
contact person

INTERESTED PARTY

STATEMENT OF CASE

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

Texaco Exploration and Production Inc., applicant in the above-styled cause, seeks blanket approval to downhole commingle Justis-Blinebry Pool and Justis-Tubb Drinkard Pool production within those wellbores that are located in portions of Sections 26 and 35, Township 24 South, Range 37 East and a portion of Section 2, Township 25 South, Range 37 East.

OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

PROPOSED EVIDENCE

APPLICANT

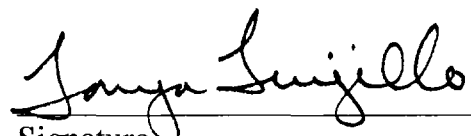
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Scott Elkington, Petroleum Engineer	30 Min.	Approximately 7

OTHER PARTY

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

(Please identify any procedural matters which need to be resolved prior to hearing)


Signature