

**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. 11429

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**

Texaco Exploration and Production Inc.  
c/o Jim Dore  
Post Office Box 46513  
Denver, CO 80237  
(915) 688-4613

name, address, phone and  
contact person

**ATTORNEY**

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

**INTERESTED PARTY**

**ATTORNEY**

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**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 exceptions from Division General Rule 303(C) to establish an area-wide basis authorization for downhole commingling of the Delaware and Bone Spring formations in the wellbores of existing or future wells drilled anywhere within the W/2 E/2 and the E/2 W/2 of Section 31, Township 23 South. Range 32 East, said production being from portions of the West Triste Draw-Delaware Pool and the South Sand Dunes-Bone Spring Pool.

**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

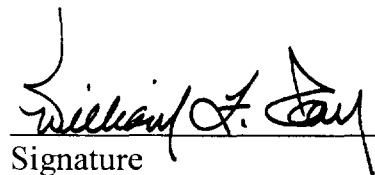
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Jim Dore, Petroleum Engineer	25 Min.	Approximately 12

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