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. 11436

APPLICATION OF ARMSTRONG ENERGY CORPORATION FOR APPROVAL OF A PRESSURE MAINTENANCE PROJECT AND QUALIFICATION FOR THE RECOVERED OIL TAX RATED, LEA COUNTY, NEW MEXICO. NOV 3 6 1995

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PRE-HEARING STATEMENT

This prehearing statement is submitted by William F. Carr, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Armstrong Energy Corporation 121 West Third Street Roswell, NM 88201 Attn: Bruce Stubbs (505) 624-2800_____

name, address, phone and contact person

OPPOSITION OR OTHER PARTY

ATTORNEY

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

ATTORNEY

name, address, phone and contact person

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STATEMENT OF CASE

<u>APPLICANT</u>

Armstrong Energy Corporation, applicant in the above-styled cause, seeks approval of its Lea Pressure Maintenance Project by injection of water into the Delaware formation, through the perforated interval from approximately 5930 feet to 5970 feet in its Mobil Federal Well No. 6 PMW located 330 feet from the South line and 990 feet from the West line of Section 2, Township 20 South, Range 34 East. The Lea Pressure Maintenance Project Area shall include the following described area:

Township 20 South, Range 34 East, NMPM Section 2: SW/4

Applicant further requests that the Division establish procedures for the administrative approval of additional injection wells within the unit area without the necessity of further hearings and the adoption of any provisions necessary for such other matters as may be appropriate for said pressure maintenance operations. Applicant further seeks to qualify this project for the recovered oil tax rate under the "Enhanced Oil recovery Act" (Law 1992, Chapter 38, Sections 1 through 5).

OPPOSITION OR 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.)

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PROPOSED EVIDENCE

<u>APPLICANT</u>

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Mike Boling, Geologist	20 Min.	Approximately 5
Bruce Stubbs, Engineer	20 Min.	Approximately 2

OPPOSITION

WITNESSES (Name and expertise) EST. TIME

EXHIBITS

PROCEDURAL MATTERS

the sec Signature