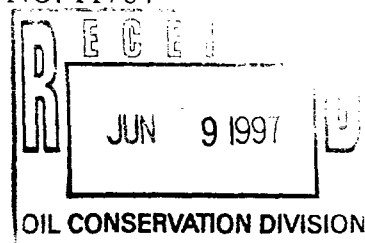


**STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION**

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

CASE NO. 11784

APPLICATION OF LAYTON ENTERPRISES  
INC. FOR A WATERFLOOD PROJECT,  
LEA COUNTY, NEW MEXICO.



**PRE-HEARING STATEMENT**

This prehearing statement is submitted by Campbell, Carr, Berge & Sheridan, P.A.,  
as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Layton Enterprises Inc.  
3103 79th Street  
Lubbock, TX 79423  
Attn: Donald R. Layton  
(806) 745-4638

name, address, phone and  
contact person

**ATTORNEY**

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

**OPPOSITION OR OTHER PARTY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

name, address, phone and  
contact person

**ATTORNEY**

\_\_\_\_\_  
\_\_\_\_\_  
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**STATEMENT OF CASE**

**APPLICANT**

Layton Enterprises, Inc., applicant in the above-styled cause, seeks authority to institute a waterflood project within an area encompassing all or portions of Sections 1, 2, 10, and 11, Township 9 South, Range 36 East, Lea County, New Mexico, and portions of Section 36, Township 8 South, Range 36 East, Roosevelt County, New Mexico, by the injection of water into the Bough "C" member of the Pennsylvanian formation, Allison-Penn Pool, in its Fox "A" State Well No. 5 located 2310 feet from the North line and 2070 feet from the West line (Unit F) of Section 2. Applicant further seeks authority to complete this injection well unconventionally by leaving both the Bough "C" and Devonian formations open in the wellbore below a packer and allowing Devonian formation water to flow freely into the Bough "C" formation to expedite reservoir fill up.

**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.)

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES  
(Name and expertise)

EST. TIME

EXHIBITS

Donald R. Layton, Engineer

20 Min.

Approximately 4

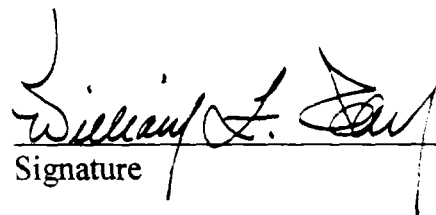
OPPOSITION

WITNESSES  
(Name and expertise)

EST. TIME

EXHIBITS

**PROCEDURAL MATTERS**

  
Signature