

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

CASE NO. 12215

**APPLICATION OF ANADARKO PETROLEUM
CORPORATION FOR DOWNHOLE COMMINGLING
EDDY COUNTY, NEW MEXICO.**

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Anadarko Petroleum Corporation, as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

Anadarko Petroleum Corporation
P. O. Box 2497
Midland, Texas 79702
(915) 683-0537
attn: Harold Jamison

ATTORNEY

W. Thomas Kellahin
KELLAHIN AND KELLAHIN
P.O. Box 2265
Santa Fe, New Mexico 87504
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OIL CONSERVATION DIV.
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STATEMENT OF CASE

Anadarko Petroleum Corporation ("Anadarko") is the operator of the E. W. Walden Well No 12, located in Unit F of Section 15, T22S, R37E, NMPM, Lea County, New Mexico.

Anadarko proposes to downhole commingle production from the Penrose Skelly-Grayburg Pool with production from the Southwest Eunice-San Andres Pool in this wellbore.

Anadarko seeks an exception from Division Rule 303.C(1)(a)(iii) which precluded the Division from administratively approving Anadarko's application because the total water volume produced is greater than the combined oil allowable.

This well has subsurface equipment and surface facilities which will allow Anadarko to economically and efficiently produce the "excess" water without waste and without violating correlative rights.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES	EST. TIME	EXHIBITS
Richard Lauderdale (production engineer)	15-20 Min	@ 6 exhibits

PROCEDURAL MATTERS

None anticipated at this time

KELLAHIN AND KELLAHIN

By: 

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