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2-29-00

**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. 12320

00 FEB 28 PM 3:59

OIL CONSERVATION DIV.

**APPLICATION OF CHEVRON USA PRODUCTION COMPANY
FOR APPROVAL TO CONVERT THE EMSU
WELLS NO. 210, 212, 222, 252, AND 258 TO
INJECTION IN THE EUNICE MONUMENT SOUTH UNIT,
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

Chevron USA
Attn: Tracy Love
P.O. Box 1150
Midland, TX 79702
(915) 687-7271

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

Doyle Hartman
Oil Operator
P.O. Box 10426
Midland, TX 79702
(915) 684-4011

ATTORNEY

Gene Gallegos, Esq.
Gallegos Law Firm
460 St. Michaels Drive, Bldg. 300
Santa Fe, NM 87505
(505) 983-6686

STATEMENT OF CASE

APPLICANT

Applicant seeks approval to convert its EMSU Wells No. 210, 212, 222, 252, and 258 to injection in the Eunice Monument South Unit (EMSU). These wells are designed to improve recovery efficiency of the waterflood patterns and enhance production of the EMSU secondary recovery project. The wells are located in the following locations: No. 210 - Section 4, Unit K, Township 21 South, Range 36 East; No. 212 - Section 5, Unit I, Township 21 South, Range 36 East; No. 222 - Section 6, Unit O, Township 21 South, Range 36 East; No. 252 - Section 6, Unit W, Township 21 South, Range 36 East; Unit No. 258 - Section 4, Unit U, Township 21 South, Range 36 East. Water will be injected into the unitized interval of the Eunice Monument Grayburg-San Andres Pool, which has an upper limit of 100 feet below mean sea level or the top of the Grayburg formation, whichever is higher, to a lower limit of the base of the San Andres formation. Injection will occur at an expected maximum pressure rate of 1500 barrels of water per day and an expected maximum pressure of 750 pounds per square inch. This area is approximately one mile west-southwest of Oil Center, New Mexico.

OPPOSITION OR OTHER PARTY

PROPOSED EVIDENCE

APPLICANT

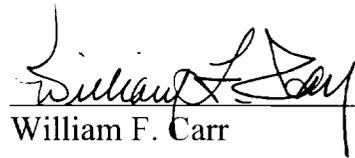
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Tracy G. Love (Petroleum Engineer)	Approx. 30 min.	Approx. 15
Greg Minnery (Geologist) (May call)	Approx. 10 min.	Approx. 2

OPPOSITION

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

Chevron has none at this time.



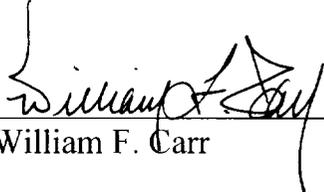
William F. Carr

CERTIFICATE OF SERVICE

I hereby certify that on this 28th of February, 2000, I have caused to be delivered a copy of our Entry of Appearance in the above-captioned case to the following named parties:

via facsimile to:

Gene Gallegos, Esq.
Gallegos Law Firm
460 St. Michael's Drive, Suite 300
Santa Fe, NM 87505
fax 986-1367



William F. Carr