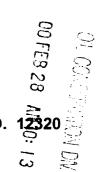
# STATE OF NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES OIL CONSERVATION

IN THE MATTER OF THE APPLICATION OF CHEVRON U.S.A. PRODUCTION CO. FOR APPROVAL TO CONVERT THE EUNICE MONUMENT SOUTH UNIT WELLS 210, 212, 222, 252 AND 258 TO INJECTION



#### PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Doyle Hartman, Oil Operator ("Hartman") in accordance with Rule 1208.B.,19 NMAC 15.N, in opposition to the Application of Chevron U.S.A. Production Co. to convert certain Eunice Monument South Unit Chevron wells to injection wells.

#### **APPEARANCES OF PARTIES**

**APPLICANTS** 

Chevron U.S.A. Production Co.

Midland, Texas

**Attorneys** 

William F. Carr

Campbell, Carr, Berge & Sheridan

P.O. Box 2208

Santa Fe, NM 87504-2208

**PARTIES** 

Doyle Hartman, Oil Operator

J.E. Gallegos

Michael J. Condon

Gallegos Law Firm, P.C.

460 St. Michael's Drive, Bldg. 300

Santa Fe, NM 87505

(505) 983-6686

To Hartman's knowledge, no other party has entered an appearance or filed opposition in this matter.

### HARTMAN'S STATEMENT OF THE CASE

Chevron purposes to convert five wells in the Eunice Monument South Unit waterflood to injector wells. Hartman is experiencing significant produced water in his Eumont gas wells within the boundaries of Chevron's waterflood. His position is set forth in a letter of November 15, 1999, a copy of which is attached hereto.

### PROPOSED EVIDENCE

#### **HARTMAN**

MAY-CALL
WITNESSES
(Name and Expertise)

**ESTIMATED TIME** 

**EXHIBITS** 

Doyle Hartman Chemical Engineer or his designee. 15 min.

As needed for rebuttal

Respectfully submitted,

GALLEGOS LAW FIRM, P.C.

J.E. GALLEGOS

MICHAEL J. CONDON

460 St. Michael's Drive, Bldg. 300 Santa Fe, New Mexico 87505

(505) 983-6686

Attorneys for Doyle Hartman, Oil Operator

## **CERTIFICATE OF SERVICE**

I hereby certify that I have caused a true and correct copy of the foregoing to be faxed and mailed on this \_\_\_\_\_\_ day of February, 2000 to the following:

William F. Carr Paul Owen Campbell, Carr, Berge & Sheridan, P.A. P.O. Box 2208 Santa Fe, NM 87504-2208

J.E. GALLEGO