

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. 10288

APPLICATION OF PHILLIPS PETROLEUM  
COMPANY FOR A PRESSURE MAINTENANCE  
PROJECT AND A SPECIAL OIL PRODUCING  
ALLOWABLE, EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by PHILLIPS  
PETROLEUM COMPANY as required by the Oil Conservation  
Division.

APPEARANCE OF PARTIES

APPLICANT  
(name, address, phone  
and contact person)

Phillips Petroleum Company  
4001 Penbrook  
Odessa, Texas 79762  
Attn: Jeff Hargrove  
(915) 368-1308

ATTORNEY

W. Thomas Kellahin  
KELLAHIN, KELLAHIN & AUBREY  
P.O. Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285

OPPOSITION OR OTHER PARTY  
(name, address, phone  
and contact person)

ATTORNEY

**RECEIVED**

APR 12 1991  
OIL CONSERVATION DIV.  
SANTA FE

**STATEMENT OF CASE**

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

Phillips Petroleum Company seeks authority to institute a pressure maintenance project on its James "A" State Lease underlying Lots 1 through 4, S/2N/2, N/2SW/4, SE/4SW/4, and SE/4 of Section 2, T22S, R30E, by the injection of water into the Cabin Lake-Delaware Pool, through a perforated interval from approximately 5600 feet to 7400 feet in a well to be drilled 1250 feet FSL and 1150 feet FEL (Unit P) of said Section 2. Applicant further seeks a special oil producing allowable whereby any well in the project area could produce its ability and would not be subject to the depth bracket allowable for said pool.

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
Jeff Hargrove (PE)	30 Min.	Well performance data Stimulation results C-108 and attachment

OPPOSITION

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
-----------------------------------	-----------	----------

**PROCEDURAL MATTERS**

(Please identify any procedural matters which need to be resolved prior to the hearing)

KELLAHIN, KELLAHIN & AUBREY

By:   
W. Thomas Kellahin