

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. 10290

APPLICATION OF AVON ENERGY CORPORATION
FOR AMENDMENT OF DIVISION ORDER NOS.
R-3185, R-3185-A, AND R-3528 TO EXPAND
THE VERTICAL LIMITS AND TO ESTABLISH AN
INJECTION PRESSURE LIMITATION
EDDY COUNTY, NEW MEXICO

RECEIVED

AUG 01 1991

OIL CONSERVATION DIV.
SANTA FE

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by AVON ENERGY CORPORATION as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT
(name, address, phone
and contact person)

ATTORNEY

Mr. T.M. Hatfield
BHI Energy Corporation
1153 Dairy Ashford, Ste. 803
Houston, Texas 77079
(713) 870-1178

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

STATEMENT OF CASE

APPLICANT

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

Applicant operates its Turner "B" Lease Waterflood Project in Eddy County, New Mexico pursuant to Division Orders R-3185, R-3185-A and R-3528 which is a waterflood project in the Premier zone of the Grayburg-San Andres formation of the Grayburg-Jackson Pool.

Applicant seeks the vertical expansion of this waterflood to include all of the Grayburg-San Andres formation and to increase the surface injection pressure limitation to 450 PSI above the formation parting pressure.

PROPOSED EVIDENCE

APPLICANT

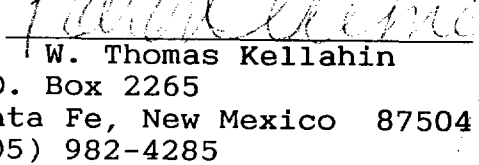
WITNESSES (name and expertise)	EST. TIME	EXHIBITS
Roy C. Williamson, Jr.	45 min.	Reservoir calculations Step-rate test Pressure plots Pertinent pro- duction & injection data on subject area Cross-section Location map Stratigraphic cross- section Frac Lite logs Prism logs Type log Ownership map show- ing analogous projects Socorro Order R-2268-C

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PROCEDURAL MATTERS

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

KELLAHIN, KELLAHIN & AUBREY

By: 
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