

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

**RECEIVED**

IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
DIVISION FOR THE PURPOSE OF  
CONSIDERING:

JUL 05 1991

OIL CONSERVATION DIV.  
SANTA FE

CASE NO. 10347

APPLICATION OF WARRIOR, INC. FOR  
A WATERFLOOD PILOT PROJECT,  
LEA COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Warrior, Inc. as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT  
(name, address, phone  
and contact person)

ATTORNEY

Unique Engineering  
P.O. Box 5970  
Hobbs, New Mexico 88241  
Attn: M.Y. Merchant  
(505) 397-3596

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

Pre-hearing Statement  
NMOCD Case No. 10347  
Page 2

**STATEMENT OF CASE**

APPLICANT

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

Warrior, Inc. seeks to institute a leasehold waterflood project on a portion of its Federal "D" lease by the injection of water into the Eumont Oil & Gas Pool in order to recover secondary oil which may not be recovered in the absence of waterflood operations.

Warrior requests an administrative procedure be established for the waterflood project area to allow for the amendment of the location of either injection or producing wells in the event such changes in location are deemed necessary.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
M.Y. Merchant (PE)	30-45 Min.	C-108 w/ attachments geologic interpretation

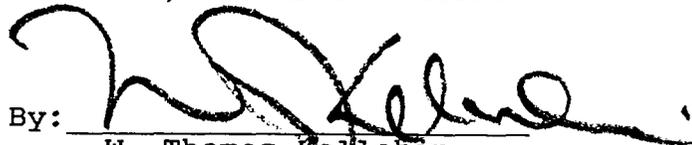
OPPOSITION

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  
P.O. Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285