# 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:

APPLICATION OF GREENHILL PETROLEUM CORPORATION FOR WATERFLOOD EXPANSION, LEA COUNTY, NEW MEXICO.

<sup>3</sup> CASE NO. 10549

RECEIVED

SEP 1 4 1992

OIL CONSERVATION DIVISION

# PRE-HEARING STATEMENT

This prehearing statement is submitted by William F. Carr, as required by the Oil Conservation Division.

#### APPEARANCES OF PARTIES

APPLICANT	ATTORNEY	
Greenhill Petroleum Corporation 11490 Westheimer Road, Suite 200 Houston, Texas 77077-6841 Attn: Mike Newport	William F. Carr Campbell, Carr, Berge & Sheridan Post Office Box 2208 Santa Fe, New Mexico 87504	
name, address, phone and contact person	(505) 988-4421	
OPPOSITION OR OTHER PARTY	ATTORNEY	
name, address, phone and contact person		

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#### STATEMENT OF CASE

### **APPLICANT**

Greenhill Petroleum Corporation, applicant, in the above-styled cause, seeks authority to expand its Lovington-Paddock Unit Waterflood Project, authorized by Division Order No. R-3124, by converting its Lovington-Paddock Unit Well No. 9 located 660 feet from the South line and 1980 feet from the West line (Unit N) of Section 30 and its Lovington Paddock Unit Well No. 10 located 660 feet from the North line and 2440 feet from the East line (Unit B) of Section 31, both in Township 16 South, Range 37 East, Lovington Paddock Unit, Lovington-Paddock Pool, from producing oil wells to water injection wells.

#### 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.)

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#### PROPOSED EVIDENCE

# **APPLICANT**

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Mike Newport, Landman	15 Min.	Approximately 2
Mark Edwards, Geologist	10 Min.	Approximately 2
Chuck Bupp, Petroleum Engineer	15 Min.	Approximately 4

## **OPPOSITION**

WITNESSES EST. TIME EXHIBITS (Name and expertise)

## PROCEDURAL MATTERS

Signature