

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. 10570

**APPLICATION OF MARATHON OIL TO  
QUALIFY A PORTION OF THE SOUTH  
EUNICE SEVEN RIVERS QUEEN UNIT  
WATERFLOOD PROJECT FOR THE RECOVERED  
OIL TAX RATE PURSUANT TO THE  
"NEW MEXICO ENHANCED OIL RECOVERY  
ACT", LEA COUNTY, NEW MEXICO**

**PRE-HEARING STATEMENT**

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

**APPEARANCE OF PARTIES**

APPLICANT

ATTORNEY

MARATHON OIL COMPANY  
P.O. Box 552  
Midland, TX 79702  
ATTN: Thomas C. Lowry, Esq.

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

OPPOSITION OR OTHER PARTY

ATTORNEY

See Opposition Filing, if any

Pre-Hearing Statement  
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## **STATEMENT OF CASE**

### APPLICANT

Marathon Oil Company (Applicant) seeks an order pursuant to the Rules and Procedures for Qualification of the Enhanced Oil Recovery Projects and Certification for the Recovered Oil Tax Rate, as promulgated by Division Order No. R-9708, qualifying a portion of its South Eunice Seven Rivers Queen Unit Waterflood Project (authorized by Division Order No. R-4217), in Sections 35 and 36, Township 22 South, Range 36 East, South Eunice Seven Rivers-Queen Unit, South Eunice Seven Rivers-Queen Pool, for the recovered oil tax rate under the "Enhanced Oil Recovery Act" (Laws 1992, Chapter 38, Sections 1 through 5).

### OPPOSITION OR OTHER PARTY

See Opposition Filing, if any

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
Michael Wiskofske Petroleum Engineer	30 Minutes	12 Exhibits
Eric Carlsen Geologist	20 Minutes	6 Exhibits

OPPOSITION

WITNESSES	EST. TIME	EXHIBITS
SEE OPPOSITION FILING, IF ANY		

**PROCEDURAL MATTERS**

None applicable at this time.

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin

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

ATTORNEYS FOR APPLICANT