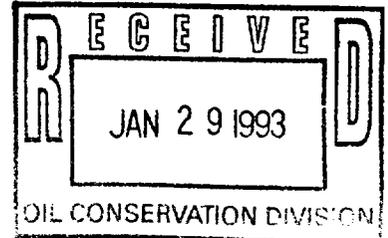


**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

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

CASE NO. 10573



APPLICATION OF TEXACO EXPLORATION &
PRODUCTION INC. FOR WATERFLOOD EXPANSION,
LEA COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted by William F. Carr, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Texaco Exploration & Production____
c/o Russell Pool_____
Post Office Box 730_____
Hobbs, New Mexico 88240_____
(505) 397-0411_____
name, address, phone and
contact person

ATTORNEY

William F. Carr, Esq._____
Campbell, Carr, Berge & Sheridan, P.A.
Post Office Box 2208_____
Santa Fe, New Mexico 87504_____
(505) 988-4421_____

OPPOSITION OR OTHER PARTY

Doyle Hartman Oil Operator _____

name, address, phone and
contact person

ATTORNEY

J. E. Gallegos, Esq._____
141 East Palace Avenue_____
Santa Fe, New Mexico 87501_____
(505) 986-0741_____

STATEMENT OF CASE

APPLICANT

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

Texaco Exploration & Production Inc. seeks authority to expand its W. H. Rhodes "B" Federal Waterflood Project, authorized by Division Order No. R-3889, by converting its Rhodes Yates Unit Well No. 8 located 1875 feet from the North line and 765 feet from the West line (Unit E) and its Rhodes Yates Unit Well No. 13 located 660 feet from the South and West lines (Unit M), both in Section 27, Township 26 South, Range 37 East, Rhodes Yates-Seven Rivers 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.)

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Charles Saddler, Geologist	15 min.	Approximately 5
Todd Mochlenbrock, Engineer	15 min.	Approximately 3

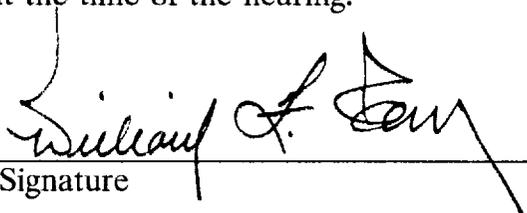
OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

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

This case will be consolidated with Case 10572 at the time of the hearing.

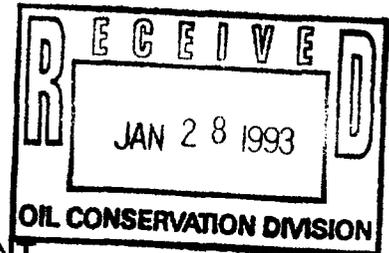

Signature

**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. 10573

**APPLICATION OF TEXACO
EXPLORATION AND PRODUCTION
INC., FOR WATERFLOOD
EXPANSION, LEA COUNTY, NEW MEXICO**



AMENDED PRE-HEARING STATEMENT

APPLICANT

**Texaco Exploration
and Production, Inc.**

ATTORNEY

**William F. Carr
Campbell, Carr, Berge &
Sheridan, P.A.
P.O. Box 2208
Santa Fe, NM 87504
(505) 988-4421**

OPPOSITION

Doyle Hartman, Oil Operator

ATTORNEY

**J.E. Gallegos
Mary E. Walta
David Sandoval
Gallegos Law Firm, P.C.
141 East Palace Avenue
Santa Fe, NM 87501
(505) 983-6696**

STATEMENT

Texaco has filed an application for expansion of waterflood projects by the conversion to water injection of the Rhodes Yates Unit Wells Nos. 8 and 13, located in Units E and M, respectively, of Section 27, Township 26 South, Range 37 East, NMPM, Lea County, New Mexico, and its W.H. Rhodes B. NCT-1 Wells Nos. 6 and 13, located in Units I and O, respectively, of said Section 27.

As an interest owner in the aforesaid Rhodes Yates Unit, Doyle Hartman, Oil Operator, objected to the approval of the proposed conversion of the above-described wells to water injection by virtue of his filing of a Pre-Hearing Statement with this Division on November 25, 1992.

In that Pre-Hearing Statement, Doyle Hartman, Oil Operator, offered to present certain testimonial and documentary evidence in opposition to the Application. With this Amended Pre-Hearing Statement Doyle Hartman, Oil Operator, informs the Division of his intent to forego the opportunity to present the testimony and documentary evidence identified in the Pre-Hearing Statement. Instead, Doyle Hartman, Oil Operator, will not be an active participant in this Application but will merely monitor this matter's progress.

Respectfully submitted,

GALLEGOS LAW FIRM, P.C.

BY *D Sandoval*

J.E. GALLEGOS

DAVID SANDOVAL

141 East Palace Avenue
Santa Fe, New Mexico 87501

Attorneys for Doyle Hartman,
Oil Operator

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Amended Pre-Hearing Statement was served via telefax on the 28th day of January, 1993 to William F. Carr, Campbell, Carr, Berge & Sheridan, P.A., 110 North Guadalupe, Suite 1, Santa Fe, New Mexico 87501

D Sandoval