

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. 10260

APPLICATION OF CHEVRON U.S.A., INC.,  
FOR AUTHORITY TO INSTITUTE A  
WATERFLOOD PROJECT FOR THE  
ARROWHEAD GRAYBURG UNIT,  
LEA COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by CHEVRON  
U.S.A., INC. as required by the Oil Conservation Division.

**APPEARANCE OF PARTIES**

APPLICANT  
(name, address, phone  
and contact person)

Chevron U.S.A., Inc.  
P.O. Box 1150  
Midland, TX 79702  
Attn: Bryan Cotner  
(915) 687-7314

ATTORNEY

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

OPPOSITION OR OTHER PARTY  
(name, address, phone  
and contact person)

ARCO Oil & Gas Company

ATTORNEY

William F. Carr  
Campbell & Black, P.A.  
P.O. Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421

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OIL CONSERVATION DIV.  
SANTA FE

Pre-hearing Statement  
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Carolyn Loveless Schlicher  
Colin McMillan  
David Petroleum Corp.  
Lucinda Loveless  
Nadine Prideaux Loveless  
Smith  
Ladd Petroleum Corp.

W. Perry Pearce  
Montgomery & Andrews, P.A.  
P.O. Box 2307  
Santa Fe, New Mexico 87504  
(505) 982-3873

#### **STATEMENT OF CASE**

##### APPLICANT

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

Chevron U.S.A., Inc. seeks authority to institute a waterflood project on its proposed Arrowhead Grayburg (San Andres) Unit Area (Division Case No. 10259) located in portions of Townships 21 and 22 South, Ranges 36 and 37 East, by the injection of water into the unitized internal which includes the Grayburg and San Andres formations, more or less, through 50 certain wells to either be drilled, recompleted or converted from producing 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
Bryan Cotner (PE)	60 Min.	20
Don Lindsay (geologist)	20 Min.	8
Denise Beckham (landman)	20 Min.	14

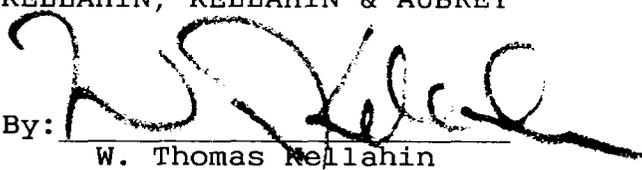
OPPOSITION OR OTHER PARTY

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 the hearing)

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin

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

**STATE OF NEW MEXICO  
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OIL CONSERVATION DIVISION**

IN THE MATTER OF THE HEARING  
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FOR A WATERFLOOD PROJECT,  
LEA COUNTY, NEW MEXICO.

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**PRE-HEARING STATEMENT**

OIL CONSERVATION DIV.  
SANTA FE

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

**APPEARANCES OF PARTIES**

**APPLICANT**

Chevron U.S.A., Inc. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

name, address, phone and  
contact person

**ATTORNEY**

W. Thomas Kellahin, Esq. \_\_\_\_\_  
Kellahin, Kellahin & Aubrey \_\_\_\_\_  
Post Office Box 2265 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_  
(505) 982-4285

**OPPOSITION OR OTHER PARTY**

ARCO Oil & Gas Company \_\_\_\_\_  
Post Office Box 1610 \_\_\_\_\_  
Midland, Texas 79702 \_\_\_\_\_  
Attn: Kent Bickham \_\_\_\_\_  
(915) 688-5632

name, address, phone and  
contact person

**ATTORNEY**

William F. Carr \_\_\_\_\_  
Campbell & Black, P.A. \_\_\_\_\_  
Post Office Box 2208 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_  
(505) 988-4421 \_\_\_\_\_

**STATEMENT OF CASE**

APPLICANT

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

OPPOSITION

WITNESSES  
(Name and expertise)

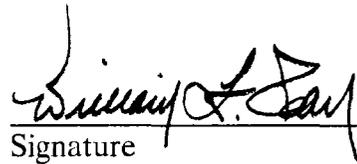
EST. TIME

EXHIBITS

None.

**PROCEDURAL MATTERS**

None.

  
Signature