

**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. 10  
(Readvertised)**

**RECEIVED**

APR 12 1991

OIL CONSERVATION DIV.  
SANTA FE

**APPLICATION OF MARATHON OIL COMPANY  
FOR A WATERFLOOD PROJECT AND 12  
UNORTHODOX INJECTION WELL LOCATIONS,  
LEA COUNTY, NEW MEXICO.**

**PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Joanne Reuter, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Marathon Oil Company \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**ATTORNEY**

W. Thomas Kellahin, Esq. \_\_\_\_\_  
Kellahin, Kellahin & Aubrey  
P.O. Box 2265 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_

**OPPOSITION OR OTHER PARTY**

Doyle Hartman \_\_\_\_\_  
Oil Operator \_\_\_\_\_  
P.O. Box 10426 \_\_\_\_\_  
Midland, Texas 79702 \_\_\_\_\_  
(915) 684-4011 \_\_\_\_\_

**ATTORNEY**

Joanne Reuter \_\_\_\_\_  
Gallegos Law Firm \_\_\_\_\_  
141 East Palace Avenue \_\_\_\_\_  
Santa Fe, New Mexico 87501 \_\_\_\_\_  
(505)983-6686 \_\_\_\_\_

## 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.)

Doyle Hartman owns 320 acres of Jalmat Yates-Seven Rivers rights offsetting and contiguous to Marathon's proposed waterflood project which rights are comparable in structural position to Marathon's McDonald State lease. Inasmuch as his leasehold ownership partially coincides with the geologic interval proposed to be flooded by Marathon, is contiguous to and offset by Marathon's waterflood project, and is situated at a comparable structural position, Hartman strongly believes that his offsetting Jalmat Gas Pool leasehold rights will be adversely affected by Marathon's currently proposed McDonald water injection project.

At this time, Mr. Hartman and Marathon are attempting to reach an agreement that would address Mr. Hartman's concerns.

**PROPOSED EVIDENCE**

**APPLICANT**

**WITNESSES**

(Name and expertise)

**EST. TIME**

**EXHIBITS**

**OPPOSITION**

**WITNESSES**

(Name and expertise)

**EST. TIME**

**EXHIBITS**

Michael Stewart, Petroleum Engineer 30 minutes

2 approximately

**PROCEDURAL MATTERS**

None.

  
JOANNE REUTER

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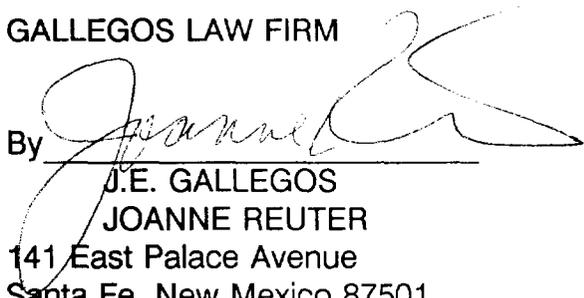
**CASE NO. 10269  
(Readvertised)**

**APPLICATION OF MARATHON OIL COMPANY  
FOR A WATERFLOOD PROJECT AND 12  
UNORTHODOX INJECTION WELL LOCATIONS,  
LEA COUNTY, NEW MEXICO.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Pre-Hearing Statement was served via hand delivery to W. Thomas Kellahin, Esq., Kellahin, Kellahin & Aubrey, P.O. Box 2265, Santa Fe, New Mexico 87504, this 12th day of April, 1991.

GALLEGOS LAW FIRM

By 

J.E. GALLEGOS  
JOANNE REUTER

141 East Palace Avenue  
Santa Fe, New Mexico 87501  
(505) 983-6686

ATTORNEYS FOR  
DOYLE HARTMAN, OIL OPERATOR

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**PROPOSED EVIDENCE**

**APPLICANT**

<b><u>WITNESSES</u></b> (Name and expertise)	<b><u>EST. TIME</u></b>	<b><u>EXHIBITS</u></b>
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**OPPOSITION**

<b><u>WITNESSES</u></b> (Name and expertise)	<b><u>EST. TIME</u></b>	<b><u>EXHIBITS</u></b>
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Michael Stewart, Petroleum Engineer	30 minutes	2 approximately
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**PROCEDURAL MATTERS**

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\_\_\_\_\_  
JOANNE REUTER

**STATE OF NEW MEXICO  
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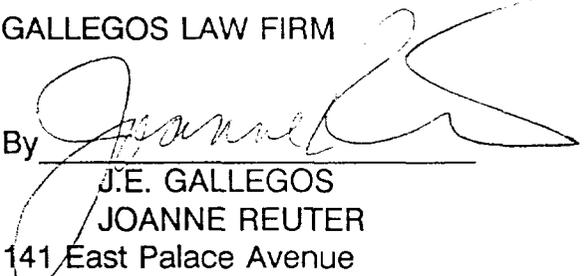
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