## 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. 10912

# APPLICATION OF ENRON OIL & GAS COMPANY FOR DOWNHOLE COMMINGLING, EDDY COUNTY, NEW MEXICO.

FFR 2 Proven

## **PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Campbell, Carr, Berge & Sheridan, P.A., as required by the Oil Conservation Division.

# **APPEARANCES OF PARTIES**

APPLICANT

### ATTORNEY

Enron Oil & Gas Company\_\_\_\_\_ c/o Patrick J. Tower\_\_\_\_ Post Office Box 2267\_\_\_\_\_ Midland, TX 79702\_\_\_\_\_ (915) 686-3758\_\_\_\_\_\_ name, address, phone and contact person

OPPOSITION OR OTHER PARTY

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

\_\_\_\_\_

ATTORNEY

name, address, phone and contact person

\_\_\_\_

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#### STATEMENT OF CASE

## **APPLICANT**

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

Enron Oil & Gas Company, applicant in the above-captioned cause, seeks approval to downhole commingle production from the Morrow formation, West Sand Dunes-Morrow Gas Pool, and Atoka formation, West Sand Dunes-Atoka Gas Pool, within the wellbore of its Pure Gold "B" Federal Well No. 2 located 660 feet from the North line and 1980 feet from the East line of Section 20, Township 23 South, Range 31 East.

## **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<br>(Name and expertise) | EST. TIME | EXHIBITS        |
|-----------------------------------|-----------|-----------------|
| Patrick J. Tower, Land            | 10 Min.   | Approximately 2 |
| Hal Crabb, Petroleum Engineer     | 15 Min.   | Approximately 2 |

**OPPOSITION** 

WITNESSES (Name and expertise) EST. TIME

**EXHIBITS** 

### **PROCEDURAL MATTERS**

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

Signature