

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

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

OIL CONSERVATION DIVISION

Cases Nos: 10,102 and  
10,103

APPLICATION OF SAGE ENERGY  
COMPANY FOR A UNIT AGREEMENT  
AND WATERFLOOD PROJECT, LEA  
COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Applicant as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

APPLICANT

ATTORNEY

Sage Energy Company  
10101 Reunion Place, Suite 800  
San Antonio, Texas 78216  
(512) 340-2288  
Attention: Mr. Lee Patrick

James Bruce  
Hinkle, Cox, Eaton,  
Coffield & Hensley  
500 Marquette, N.W.  
Suite 800  
Albuquerque, N.M. 87102  
(505) 768-1500

OPPOSITION OR OTHER PARTY

ATTORNEY

**STATEMENT OF CASE**

APPLICANT

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

Applicant seeks statutory unitization of the North Vacuum (Abo) North Unit, and approval of the waterflood project for the Unit, covering all or portions of Sections 35 and 36-16 South-34 East, and Sections 1, 2, and 12-17 South-34 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.)

**PROPOSED EVIDENCE**

NOTE: This case was heard on October 3, 1990, and most of applicant's evidence was presented at that time. The case was continued because of notice defects.

APPLICANT

| WITNESS<br>(Name and expertise) | EST. TIME  | EXHIBITS  |
|---------------------------------|------------|---|
| Lee Patrick<br>(Landman)        | 15 minutes | (a) Notice Letters<br>(b) Ratifications   |
| Jay Hardy<br>(Engineer)         |            | Mr. Hardy presented his testimony at the October 3, 1990 hearing, but will be available to answer questions for the Examiner. |

OPPOSITION

| WITNESS<br>(Name and expertise) | EST. TIME | EXHIBITS |
|---------------------------------|-----------|----------|
|---------------------------------|-----------|----------|

**PROCEDURAL MATTERS**

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

Respectfully Submitted,

HINKLE, COX, EATON, COFFIELD &  
HENSLBY

By 

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Suite 800  
Albuquerque, New Mexico 87102  
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Attorneys for Applicant