

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

**APPLICATION OF WISHBONE TEXAS
OPERATING COMPANY, LLC FOR
REINSTATEMENT OF INJECTION WELL PERMITS
TO ENHANCE OIL RECOVERY IN
DENTON DEVONIAN WATERFLOOD PROJECT,
LEA COUNTY, NEW MEXICO.**

CASE NO. 20406

PRE-HEARING STATEMENT

Wishbone Texas Operating Company, LLC (“Wishbone”), by Candace Callahan of Beatty & Wozniak, P.C., provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

Wishbone Texas Operating Company, LLC

APPLICANT’S ATTORNEY

Candace Callahan
500 Don Gaspar Avenue
Santa Fe, NM 87505
(505) 983-8764
ccallahan@bwenergyllaw.com

OTHER PARTY OR OPPONENT

ATTORNEY

STATEMENT OF THE CASE

Applicant seeks an order reinstating injection well permits to enhance oil recovery in the Denton Devonian Waterflood Project (“the Project”) and reaffirming that the Project and its related qualification under the Enhanced Oil Recovery Act (L. 1992, Ch. 38) has been continuous since initially approved by the Division. The two wells for which reactivation is requested are:

- a. W. T. Mann A Well No. 2, an existing well located 660 feet from the north line and 2310 feet from the east line of Section 36, Township 14 South, Range 37 East; and

- b. T. D. Pope 36 Well No. 10, an existing well located 350 feet from the north line and 990 feet from the west line of Section 36, Township 14 South, Range 37 East.

This is an active water flood project; however, injection authority terminated on or about December 2014 due to inactivity by the previous unit operator. The application is not a horizontal or vertical expansion of the Project as originally approved by Division Order No. R-13387 dated May 5, 2011.

PROPOSED EVIDENCE

WITNESSES	ESTIMATED TIME	EXHIBITS
Brian Wood (Regulatory Consultant)	15 minutes	Approx. 4
H. Craig Clark (Engineer)	25 minutes	Approx. 5

PROCEDURAL MATTERS

None.

BEATTY & WOZNIAK, P.C.

By: 

Candace Callahan
500 Don Gaspar Avenue
Santa Fe, New Mexico 87505
(505) 983-8545 or (505) 983-8765 (direct)
(800) 886-6566 (fax)
ccallahan@bwenergylaw.com

ATTORNEYS FOR WISHBONE TEXAS OPERATING
COMPANY, LLC