

COPY

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

APPLICATION OF PETROLIA ENERGY CORPORATION  
FOR AUTHORIZATION TO INJECT  
CHAVES COUNTY, NEW MEXICO

Case No. 16250

PETROLIA'S PRE-HEARING STATEMENT

Petrolia Energy Corporation ("Petrolia"), the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Petrolia Energy Corporation  
710 N. Post Oak Road, Suite # 512  
Houston, TX. 77024  
(505) 466-8120

ATTORNEYS

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APPLICANT'S STATEMENT OF CASE

Petrolia seeks an order to re-activate five (5) shut in water injection wells and increase oil recovery. Injection authority previously terminated on June 10, 2013 due to inactivity by the previous Unit operator and there have also been at least three (3) subsequent approvals: R-8611 (1998); WFX-779 (2001), and WFX-793 (2003). This has been an active water flood unit and the application is not a horizontal or vertical expansion of an existing injection project. Produced water is sought to be injected using TLSAU well numbers 50, 59, 68, 70, and 88 and all wells for review are situated totally within the unit. These wells inject into the Twin Lakes; San Andres (ASSOC) Pool located in Chaves County, NM covering all or part of T8 S R28 E secs. 25, 26, 35,

36; T8 S R29 E secs. 30, 31,32; T9 S R28 E secs. 1, 2, 12; T9 S R29 E secs. 5,6,8 ,18 and as more particularly described in Petrolia's Published Notice and Application.

**APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
John C. Maxey, P.E.	Approx. 15 minutes	Approx. 6
Zel C. Khan	Approx. 10 minutes	Approx. 4

**PROCEDURAL MATTERS**

None at this time

Respectfully submitted,



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