

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

**IN THE MATTER OF THE APPLICATION OF MACK
ENERGY CORPORATION FOR AN AMENDMENT TO
ORDER NO. R-3127-A EXTENDING THE VERTICAL
LIMITS OF THE GRAYBURG-JACKSON WEST
COOPERATIVE UNIT AND FOR THE EXPANSION
OF INJECTION OPERATIONS,
EDDY COUNTY, NEW MEXICO**

CASE NO. 13608

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Miller Stratvert P.A. (J. Scott Hall) on behalf of Mack Energy Corporation, as required by the Oil Conservation Division.

APPEARANCES

APPLICANT'S ATTORNEY

J. Scott Hall, Esq.
Miller Stratvert P.A.
150 Washington Ave., Suite 300
Post Office Box 1986
Santa Fe, New Mexico 87504
(505) 989-9614

APPLICANT

Mack Energy Corporation

OPPONENT'S ATTORNEY

OPPONENT

OTHER PARTY'S ATTORNEY

OTHER PARTY

2006 APR 6 PM 4 27

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order amending the previous orders of the Division approving the Grayburg-Jackson West Cooperative Unit Agreement to extend the vertical limits of the unitized formation to include all formations from the top of the Seven Rivers formation to the base of the Glorieta-Yeso (Paddock) formation. Applicant also seeks authorization to expand waterflood injection operations to include all intervals within the extended vertical limits of the unitized formation in the Grayburg-Jackson West Cooperative Unit comprised of approximately 2,400 acres of State of New Mexico and fee lands in the following acreage:

Township 17 South, Range 29 East, NMPM

Section 15: W1/2SW1/4

Section 16: All

Section 21: All

Section 22: W1/2W1/2, E1/2NW1/4,
NE1/4SW1/4, NW1/4NE1/4

Section 27: W1/2SW1/4

Section 28: All

OPPOSITION OR OTHER PARTY

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

NO. OF EXHIBITS

Matt Brewer (Geologist)

30 Minutes

5

Ron Lanning (Landman)

15 Minutes

5

OPPOSITION

WITNESSES

EST. TIME

NO. OF EXHIBITS

PROCEDURAL MATTERS

Applicant will request that this matter be consolidated with Case No. 13609 for hearing.

MILLER STRATVERT P.A.



By: _____

J. Scott Hall
Attorneys for Mack Energy Corporation
Post Office Box 1986
Santa Fe, New Mexico 87504-1986
(505) 989-9614
(505) 989-9857 (Facsimile)