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. 11100

IN THE MATTER OF THE APPLICATION OF TEXACO EXPLORATION AND PRODUCTION INC. FOR DOWNHOLE COMMINGLING, SAN JUAN COUNTY, NEW MEXICO.

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
Texaco Exploration and Production Inc. c/o Rached Hindi 3300 North Butler Farmington, NM 87401 (505) 325-4397	William F. Carr, Esq. Campbell, Carr, Berge & Sheridan, P.A. Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421
name, address, phone and contact person	
OTHER PARTY	ATTORNEY

name, address, phone and contact person

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STATEMENT OF CASE

<u>APPLICANT</u>

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

Texaco Exploration and Production Inc., applicant in the above-styled cause, seeks approval to downhole commingle Fulcher Kutz-Pictured Cliffs Pool gas production with Basin Dakota Pool gas production in the wellbore of its H.J. Loe Federal "B" Well No. 2-E, located 1700 feet from the North line and 1050 feet from the West line (Lot 5/Unit E) of Section 23, Township 29 North, Range 12 West.

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 EST. TIME EXHIBITS

(Name and expertise)

Rached Hindi, Petroleum Engineer 20 Min. Approximately 8

OTHER PARTY

WITNESSES EST. TIME EXHIBITS (Name and expertise)

PROCEDURAL MATTERS

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

Signature