

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:

1 E

WV ?

CASE NO. 11152

JOINT APPLICATION OF TEXACO  
EXPLORATION AND PRODUCTION INC.  
and MARATHON OIL COMPANY FOR  
A PRESSURE MAINTENANCE PROJECT,  
ETC., LEA COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This prehearing statement is submitted by Shell Western E&P Inc. as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Texaco Exploration & Production Inc.

Marathon Oil Company

**ATTORNEY**

William F. Carr  
Post Office Box 2208  
Santa Fe, NM 87504-2208

W. Thomas Kellahin  
Post Office Box 2265  
Santa Fe, NM 87504-2265

**OTHER PARTY**

Shell Western E&P Inc.  
Post Office Box 576  
Houston, Texas 77001  
(713) 544-3868  
Attn: R. L. Sykes

**ATTORNEY**

HINKLE, COX, EATON,  
COFFIELD & HENSLEY  
James Bruce  
Post Office Box 2068  
Santa Fe, NM 87504-2068

**STATEMENT OF CASE**

**APPLICANT**

Texaco and Marathon seek to institute a pressure maintenance project for the Vacuum-Drinkard Pool, together with related relief.

**OTHER PARTY**

Shell is an offset operator to the proposed project, with two top allowable wells producing from the Vacuum-Drinkard Pool. Shell is in favor of the project. However, in order to protect its wells, Shell requests that a provision for lease line agreements between operators be incorporated into any order approving the project. A proposed provision is attached hereto as Exhibit A.

**PROPOSED EVIDENCE**

**APPLICANT**

WITNESSES	EST. TIME	EXHIBITS
-----------	-----------	----------

**OTHER PARTY**

WITNESSES	EST. TIME	EXHIBITS
-----------	-----------	----------

Shell does not intend to present any witnesses.

**PROCEDURAL MATTERS**

HINKLE, COX, EATON,  
COFFIELD & HENSLEY

By:



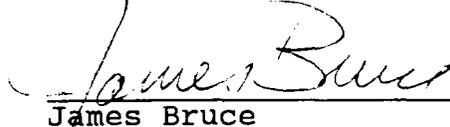
James Bruce  
Post Office Box 2068  
Santa Fe, New Mexico 87504-2068  
(505) 982-4554

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing **Pre-Hearing Statement** were mailed this 22<sup>nd</sup> day of November, 1994, to:

W. Thomas Kellahin  
Post Office Box 2265  
Santa Fe, New Mexico 87504-2265

William F. Carr  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208



James Bruce

Prior to commencing the drilling or recompletion of any injection wells located in the NW $\frac{1}{4}$ NE $\frac{1}{4}$  and N $\frac{1}{2}$ NW $\frac{1}{4}$  of Section 6, Township 18 South, Range 35 East, the NE $\frac{1}{4}$ NE $\frac{1}{4}$  of Section 1, Township 18 South, Range 34 East, and the E $\frac{1}{2}$ SE $\frac{1}{4}$  of Section 36, Township 17 South, Range 34 East, except for the proposed Texaco Exploration and Production Inc. N.M. "L" St. Well No. 16 to be located 1310 feet FNL and 10 feet FEL of Section 1, Township 18 South, Range 34 East, to be used for the proposed Vacuum Drinkard Pressure Maintenance Project or for any secondary or tertiary recovery project instituted thereafter, the operator of said acreage shall submit to the Santa Fe Office of the Division an Injection Lease Line Agreement executed by the operator and Shell Western E&P Inc., or any successor in interest to Shell Western E&P Inc.

shllwst.ins

