

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:

APPLICATION OF ENRON OIL & GAS COMPANY
FOR DOWNHOLE COMMINGLING
AND A SPECIAL ALLOWABLE,
EDDY COUNTY, NEW MEXICO.

CASE 11424

PRE-HEARING STATEMENT

This Prehearing Statement is submitted by Campbell, Carr & Berge, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Enron Oil & Gas Company
c/o Patrick Tower
Post Office Box 2267
Midland, TX 79702
(915) 686-3758

name, address, phone and
contact person

ATTORNEY

William F. Carr, Esq.
Campbell, Carr & Berge, P.A.
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

OTHER PARTY

name, address, phone and
contact person

ATTORNEY

STATEMENT OF CASE

APPLICANT

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

Enron Oil & Gas Company, applicant in the above-styled cause, seeks exceptions from the Division General Rule 303(C) to establish an area-wide basis authorization for downhole commingling of Delaware, Bone Spring and Wolfcamp formations production in the wellbores of existing or future wells drilled anywhere within Section 36, Township 22 South, Range 30 East; the S/2 of Section 31, Township 22 South, Range 31 East; Section 1, Township 23 South, Range 30 East; and Section 6, Township 23 South, Range 31 East, said production being from portions of the Southeast Quahada Ridge-Delaware Pool, Los Medanos-Bone Spring Pool and the South Los Medanos-Wolfcamp Pool. Applicant also seeks the establishment of a special allowable for wells commingled within this area based on the top allowable of the shallowest commingled formation i.e., 320 barrels of oil per day for Bone Spring or 187 barrels of oil per day where Delaware is commingled.

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.)

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Patrick J. Tower, Landman	10 Min.	Approximately 4
Bruce Insalaco, Geologist	15 Min.	Approximately 6
Randy Cate, Petroleum Engineer	15 Min.	Approximately 6

OTHER PARTY

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
-----------------------------------	-----------	----------

PROCEDURAL MATTERS

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


Signature