

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 POGO PRODUCING COMPANY
FOR A PILOT PRESSURE MAINTENANCE
PROJECT, ETC. EDDY COUNTY, NEW MEXICO.

Case No. 12223

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Pogo Producing Company
P.O. Box 10340
Midland, Texas 79702

Attention: Scott McDaniel
(915) 685-8121

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504

(505) 982-2043

OPPONENT

STATEMENT OF THE CASE

APPLICANT

Applicant seeks to institute a pilot pressure maintenance project in the West Sand Dunes-Delaware Pool on Federal Leases NM 38463, 38464, NM 40859, and NM 0281482-A (comprising all or parts of Sections 20, 21, 28, and 29, Township 23 South, Range 31 East, NMPM) by the injection of produced water into the Pure Gold "B" Fed. Well No. 20, located in Unit P of Section 20. Applicant also seeks to qualify the project for the recovered oil tax rate pursuant to the Enhanced Oil Recovery Act.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Scott McDaniel (landman)	10 min.	Three
George Dillman (geologist)	20 min.	Five
Ron Gasser (engineer)	20 min.	Five

OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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PROCEDURAL MATTERS

-None-



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Attorney for Pogo Producing Company