

**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. 11018

IN THE MATTER OF THE APPLICATION
OF TEXACO EXPLORATION AND PRODUCTION
INC. FOR POOL CREATION AND THE
PROMULGATION OF SPECIAL POOL RULES,
LEA COUNTY, NEW MEXICO.

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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 Todd Moehlenbrock
Post Office Box 3109
Midland, TX 79702
(915) 688-4662

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

STATEMENT OF CASE

APPLICANT

(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 the creation of a new pool for the production of oil from the Drinkard and Abo formations, underlying the NE/4 NE/4 of Section 8 and the NW/4 NE/4 and N/2 NW/4 of Section 9, both in Township 23 South, Range 37 East, and the promulgation of special rules and regulations including a special gas-oil ratio limitation of 10,000 cubic feet of gas per barrel of oil produced.

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
Bill Hay, Geologist	15 Min.	Approximately 2
Todd Moehlenbrock, Petroleum Engineer	30 Min.	Approximately 8

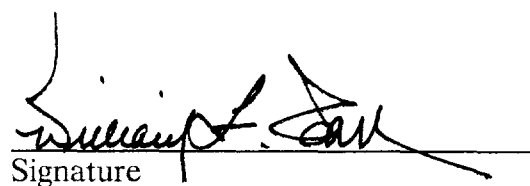
OTHER PARTY

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

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

Texaco will request that Cases 11018, 11016 and 11017 be consolidated for purposes of testimony.


Signature