STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION RECEIVED

JUN 27 1992

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

OIL CONSERVATION DIVISION

CASE NO. 10495

APPLICATION OF BEACH EXPLORATION, INC. FOR AMENDMENT OF DIVISION ORDER NO. R-9453 TO INCREASE THE INJECTION PRESSURE LIMITATION IN ITS RED LAKE PENROSE WATERFLOOD PROJECT, EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by BEACH EXPLORATION, INC. as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

ATTORNEY

Beach Exploration, Inc. ATTN: Mr. Hal Gill 800 N. Marienfeld, #200 Midland, TX 79701 W. Thomas Kellahin KELLAHIN, KELLAHIN & AUBREY P.O. Box 2265 Santa Fe, NM 87504 (505) 982-4285

OPPOSITION OR OTHER PARTY

ATTORNEY

N/A

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STATEMENT OF CASE

APPLICANT

Beach Exploration Inc. seeks an amendment to Division Order R-9453 to increase the surface injection pressure limitation to 1500 PSI in each of the 14 existing injection wells located within its Red Lake Penrose Waterflood Project, Eddy County, New Mexico.

Applicant has previously submitted step rate tests to the Division and is currently authorized a 900 PSI surface injection pressure limitation.

Applicant has developed additional engineering data to demonstrate that increasing the surface pressure limitation to 1500 PSI will not cause fractures to extend outside of the approved flood interval.

OPPOSITION OR OTHER PARTY

N/A

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PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
Hal Gill Petroleum Engineer	30-40 Min.	8 Exhibits
Brad Robinson Petroleum Engineer	30-40 Min.	20 Exhibits

OPPOSITION

WITNESSES EST. TIME EXHIBITS

SEE OPPOSITION FILING, IF ANY

PROCEDUPAL MATTERS

None applicable at this time.

KELLAHIN, KELLAHIN & AUBREY

W. Thomas Kellahin

P.O. Box 2265

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Santa Fe, New Mexico (505) 982-4285 ATTORNEYS FOR APPLICANT