STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT ()()

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

APPLICATION OF APACHE CORPORATION FOR APPROVAL OF A PILOT SECONDARY RECOVERY PROJECT, LEA COUNTY, NEW MEXICO.

Case No. 14,803

AMENDED PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT Apache Corporation Suite 1500 6120 South Yale Tulsa, Oklahoma 74136

APPLICANT'S ATTORNEY

James Bruce P.O. Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043

Attention: Michelle Hanson (918) 491-4838

OTHER PARTY

OTHER PARTY'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks approval to amend Division Order No. R-13176, approving a pilot secondary recovery project by the injection of water into the Blinebry, Tubb, and Drinkard formations into the Blankenship Well No. 2, located 2075 feet from the south line and 555 feet from the west line of Section 12, Township 20 South, Range 38 East, NMPM, at depths of 6046-7028 feet subsurface, to include the Paddock formation at depths of 5946-6045 feet subsurface.

<u>OPPONENT</u>

PROPOSED EVIDENCE

APPLICANT

WITNESSES

Michelle Hanson

EST, TIME

EXHIBITS

Approx. 3

John Nelson (engineer)

(landman)

30 min.

10 min.

Approx. 6

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

Respectfully submitted, 11LL

James Bruce Post Office Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043

Attorney for Apache Corporation

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