

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

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

APPLICATION OF CELERO ENERGY II, LP  
FOR STATUTORY UNITIZATION, CHAVES  
AND LEA COUNTIES, NEW MEXICO.

Case No. 14,914

APPLICATION OF CELERO ENERGY II, LP TO  
INSTITUTE A WATERLOO PROJECT AND  
TERTIARY RECOVERY PROJECT FOR THE  
NORTH CAPROCK CELERO QUEEN UNIT AREA,  
CHAVES AND LEA COUNTIES, NEW MEXICO.

Case No. 14,915

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Celero Energy II, L.P.  
Suite 1601  
400 West Illinois  
Midland, Texas 79701

APPLICANT'S ATTORNEY

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

Attention: John E. Lodge  
(432) 686-1883

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Case 14,914: Applicant seeks an order statutorily unitizing all mineral interests in the Queen formation in the proposed North Caprock Celero Queen Unit underlying 2846.66 acres of state

**Case 14,915:** Applicant seeks approval to institute a waterflood project and a tertiary recovery project in the North Caprock Celero Queen Unit Area by the injection of water and carbon dioxide into the Queen formation in wells located on 2846.66 acres of state and fee lands covering all or parts of Section 36 of Township 12 South, Range 31 East, N.M.P.M., Sections 30-32 of Township 12 South, Range 32 East, N.M.P.M., and Sections 5-8, 13 South, Range 32 East, N.M.P.M.

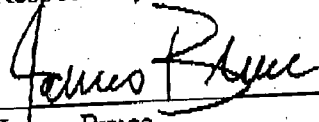
## PROPOSED EVIDENCE

Approx. 6

## EXHIBITS

Applicant requests that these matters be consolidated for hearing.

Respectfully submitted,



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Attorney for Celero Energy II, L.P.