

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

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IN THE MATTER OF THE APPLICATION
OF SUNDOWN ENERGY LP FOR
AUTHORIZATION TO INJECT FOR
WATERFLOOD PROJECT OPERATIONS;
LEA COUNTY, NEW MEXICO.

CASE NO. 14983

PRE-HEARING STATEMENT

Sundown Energy LP provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

Sundown Energy LP

APPLICANT'S ATTORNEY

J. Scott Hall
Montgomery & Andrews
P.O. Box 2307
Santa Fe, NM 87504-2307
(505) 982-3873

OTHER PARTY

None

OTHER PARTY'S ATTORNEY

STATEMENT OF THE CASE

Applicant seeks approval to conduct waterflood operations to support production from its Bobbi State Waterflood Unit by converting the following wells to injection:

State of New Mexico W No. 2
API No. 30-025-26605
660' FNL and 660' FWL (Unit D)
Section 28
T-18-S, R-36-E, NMPM

Bobbi No. 4

API No. 30-025-27586
1650' FSL and 990' FWL (Unit L)
Section 20
T-18-S, R-36-E, NMPM

PROPOSED EVIDENCE

SUNDOWN ENERGY

| <u>WITNESSES</u> | <u>EST. TIME</u> | <u>EXHIBITS</u> |
|----------------------------------|------------------|-----------------|
| Kyle Paxton, Landman | 30 minutes | 6 |
| Ross Pearson, Petroleum Engineer | 30 minutes | 8 |

OTHER

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

Applicant requests that Case No. 14983 be consolidated with Case No. 14982 for the conduct of a single hearing.

Montgomery and Andrews, P.A.

By: _____

J. Scott Hall
J. Scott Hall, Esq.
Post Office Box 2307
Santa Fe, New Mexico 87504
(505) 982-3873
(505) 982-4289
Attorneys for Sundown Energy LP

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served to counsel of record by electronic mail this _____ day of April, 2013.

N/A

J. Scott Hall

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