

**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. 13583**

**APPLICATION OF CHESAPEAKE OPERATING, INC.  
FOR APPROVAL OF A WATERFLOOD PROJECT  
AND QUALIFICATION OF THE PROJECT AREA OF  
THE TRINITY BURRUS UNIT FOR THE  
RECOVERED OIL TAX RATE PURSUANT FO THE  
ENHANCED OIL RECOVERY ACT, LEA COUNTY,  
NEW MEXICO**

2005 OCT 13 PM 3 05

**PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Holland & Hart LLP as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Chesapeake Operating, Inc.  
Attn: Terry Frohnappfel  
6100 N. Western  
Post Office Box 18496  
Oklahoma City, OK 73154-0496  
(405) 810-2727

**ATTORNEY**

William F. Carr, Esq.  
Holland & Hart LLP  
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(505) 988-4421

**STATEMENT OF CASE**

Applicant in the above-styled cause, seeks approval of its Trinity Burrus Unit Waterflood Project by injection of water into the Wolfcamp formation through seven injection wells located in the following described area:

**TOWNSHIP 12 SOUTH, RANGE 38 EAST, NMPM**

Section 15:	E/2 SW/4, SW/4 SE/4
Section 22:	E/2, E/2 W/2
Section 23:	W/2, W/2 E/2
Section 26:	W/2 W/2, NE/4 NW/4, SE/4 SW/4
Section 27:	E/2, E/2 W/2

The applicant requests that the Division establish procedures for the administrative approval of additional injection wells within the unit area without the necessity of further hearings and the adoption of any provisions necessary for such other matters as may be appropriate for said waterflood operations. Said area is located approximately 25 miles northeast of Lovington, New Mexico.

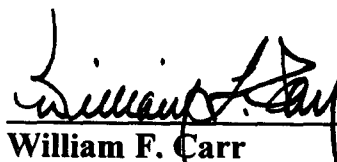
**PROPOSED EVIDENCE**

**APPLICANT**

<b><u>WITNESSES</u></b>	<b><u>EST. TIME</u></b>	<b><u>EXHIBITS</u></b>
Terry Frohnapfel (Land)	Approx. 20 Min.	Approx. 12
David Godsey (Geology)	Approx. 15 Min.	Approx. 4
Everett Bradley (Engineer)	Approx. 20 Min.	Approx. 5

**PROCEDURAL MATTERS**

Chesapeake Operating, Inc., will request that this case be consolidated for the purposes of hearing with Case 13582.



William F. Carr

Attorneys for Chesapeake Operating, Inc.