

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

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

APPLICATION OF ENERQUEST RESOURCES, LLC  
FOR APPROVAL OF A WATERFLOOD PROJECT  
AND QUALIFICATION OF THE PROJECT AREA  
FOR THE RECOVERED OIL TAX RATE PURSUANT  
TO THE ENHANCED OIL RECOVERY ACT, LEA  
COUNTY, NEW MEXICO.

Case No. 13041. (de novo)

APPLICATION OF ENERQUEST RESOURCES, LLC  
FOR STATUTORY UNITIZATION, LEA COUNTY,  
NEW MEXICO.

Case No. 13042. (de novo)

PRE-HEARING STATEMENT

This entry of appearance and pre-hearing statement is submitted by  
Lowe Partners, LP and Rocket Oil & Gas Company LP.

APPEARANCES

APPLICANT

EnerQuest Resources, LLC

APPLICANT'S ATTORNEY

William F. Carr

OPPONENTS

Lowe Partners, LP  
P.O. Box 832  
Midland, Texas 79702  
(915) 684-7441

OPPONENTS' ATTORNEY

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

Attention: Richard Gill

Rocket Oil & Gas Company LP  
P.O. Box 22854  
Denver, Colorado 80222  
(303) 321-0606

Attention: Kevin Preston

STATEMENT OF THE CASE

APPLICANT

Applicant proposes to unitize and waterflood 920 acres of land in  
Lea County.

OPPONENTS

Lowe Partners, LP and Rocket Oil & Gas Company LP object to unitization based upon the participation formula proposed by applicant. Opponents assert that a two phase participation formula is fair and equitable, as opposed to the one phase formula proposed by applicant.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENTS

WITNESSES

Richard Gill  
(engineer)

EST. TIME

30 Min.

EXHIBITS

1. Proposed participation schedule
2. Letter of support
3. Cumulative production numbers
4. Letter
5. Applicant's original unitization proposal

**PROCEDURAL MATTERS**

-None-

Respectfully submitted,



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

Attorney for Lowe Partners, LP and  
Rocket Oil & Gas Company LP

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 5th day of September, 2003 by fax and United State Mail:

William F. Carr  
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