

**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:**

**APPLICATION OF APOLLO ENERGY L.P. FOR
APPROVAL OF A WATERFLOOD PROJECT,
EDDY COUNTY, NEW MEXICO.**

Case No. 13,935

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Apollo Energy, L.P.
Suite 1100
6363 Woodway
Houston, Texas

Attention: Tommy Wright

APPLICANT'S ATTORNEY

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

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks approval to re-instate a waterflood (secondary recovery) project in the Russell (Yates) Pool, originally approved by Oil Conservation Commission Order No. R-263, by the injection of water into seven wells located on Federal Lease LC 050797 insofar as it covers the SW/4SE/4 of Section 12, N/2, SW/4, N/2SE/4, and SW/4SE/4 of Section 13, and SE/4SE/4 of Section 14, Township 20 South, Range 28 East, N.M.P.M.

OPPONENT

PROPOSED EVIDENCE**APPLICANT****WITNESSES**Jerry Ebanks
(geologist)Greg Hall
(engineer)**EST. TIME**

20 min.

20 min.

EXHIBITS

Approx. 6

Approx. 4

OPPONENT**WITNESSES****EST. TIME****EXHIBITS****PROCEDURAL MATTERS**

-None-

Respectfully submitted,

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

Attorney for Apollo Energy, L.P.