

**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 POGO PRODUCING COMPANY  
TO INSTITUTE A COOPERATIVE TERTIARY  
RECOVERY PROJECT AND TO QUALIFY THE  
PROJECT FOR THE RECOVERED OIL TAX RATE,  
LEA COUNTY, NEW MEXICO.**

**Case No. 13,581**

**PRE-HEARING STATEMENT**

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

**APPEARANCES**

**APPLICANT**

Pogo Producing Company  
P.O. Box 10340  
Midland, Texas 79702

Attention: Leslyn Wallace  
(432) 685-8127

**APPLICANT'S ATTORNEY**

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

**OPPONENT**

**OPPONENT'S ATTORNEY**

**STATEMENT OF THE CASE**

**APPLICANT**

Applicant seeks approval to institute a tertiary recovery project in the Paduca-Delaware Pool by the injection of water and carbon dioxide into approximately 55 wells located on the following state and federal lands:

**Township 25 South, Range 32 East, N.M.P.M.**

Section 9: E $\frac{1}{2}$ SE $\frac{1}{4}$

Section 10: SW $\frac{1}{4}$ NE $\frac{1}{4}$ , SE $\frac{1}{4}$ NW $\frac{1}{4}$ , and SW $\frac{1}{4}$

Section 15: W $\frac{1}{2}$ NE $\frac{1}{4}$  and W $\frac{1}{2}$

WJD 10/20/05

Section 16: E½NE¼ and S½  
Section 20: E½SE¼  
Section 21: All  
Section 22: NW¼ and NW¼SW¼  
Section 28: N½N½ and SE¼NW¼  
Section 29: NE¼NE¼

Applicant further seeks to qualify the project for the recovered oil tax rate pursuant to the "New Mexico Enhanced Oil Recovery Act" (Laws 1992, Chapter 38, Sections 1-5).

OPPONENT

**PROPOSED EVIDENCE**

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Leslyn Wallace (landman)	20 min.	Approx. 6
Glenn Curry (geologist)	15 min.	Approx. 4
Mark Kelcey (engineer)	30 min.	Approx. 4

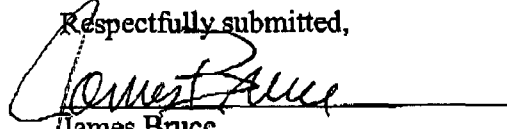
OPPONENT

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

-None-

Respectfully submitted,

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

Attorney for Pogo Producing Company