

**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 APACHE CORPORATION  
FOR APPROVAL OF A WATERFLOOD  
PROJECT AND TO QUALIFY THE PROJECT  
FOR THE RECOVERED OIL TAX RATE, LEA  
COUNTY, NEW MEXICO.**

**Case No. 14,126**

**PRE-HEARING STATEMENT**

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

**APPEARANCES**

**APPLICANT**

Apache Corporation  
Suite 1500  
6120 South Yale  
Tulsa, Oklahoma 74136

Attention: Mario Moreno  
(918) 491-4963

**APPLICANT'S ATTORNEY**

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

**OTHER PARTY**

**OTHER PARTY'S ATTORNEY**

**STATEMENT OF THE CASE**

**APPLICANT**

Applicant seeks approval to institute a waterflood project in the Blinebry, Tubb, and Drinkard formations by the injection of water into twenty seven wells located on state, federal, and fee lands covering parts of Sections 4, 8, 9, 16, 17, and 21, Township 21 South, Range 37 East, N.M.P.M. 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****WITNESSES****EST. TIME****EXHIBITS**Mario Moreno  
(landman)

25 min.

Approx. 18

Robert Curtis  
(geologist)

25 min.

Approx. 6

Kevin Mayes  
(engineer)


45 min.

Approx. 10

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

Applicant requests that this matter be consolidated for hearing with Case No. 14,125.

Respectfully submitted,



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

Attorney for Apache Corporation