### 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 PILOT SECONDARY RECOVERY PROJECT, LEA COUNTY, NEW MEXICO.

JAMESBRUCE

Case No. 14,360

### **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:

Michelle Hanson

(918) 491-4838

**OTHER PARTY** 

OTHER PARTY'S ATTORNEY

APPLICANT'S ATTORNEY

Santa Fe, New Mexico 87504

James Bruce

P.O. Box 1056

(505) 982-2043

#### STATEMENT OF THE CASE

#### **APPLICANT**

Applicant seeks approval to institute a pilot secondary recovery project by the injection of water into the Blinebry, Tubb, and Drinkard formations into the Blankenship Well No. 2, located 2075 feet from the south line and 555 feet from the west line of Section 12, Township 20 South, Range 38 East, NMPM, at depths of 5900-7100 feet subsurface.

# **OPPONENT**

### PROPOSED EVIDENCE

# **APPLICANT**

**WITNESSES** 

<u>WITNESSES</u> <u>EST. TIME</u> <u>EXHIBITS</u>

Michelle Hanson 10 min. Approx. 3 (landman)

15 min. Approx. 3

(geologist)

Jeff Frederick30 min.Approx. 3

(engineer)

<u>OPPONENT</u>

**EXHIBITS** 

#### PROCEDURAL MATTERS

EST. TIME

Respectfully submitted,

James Bruce

Post Office Box 1056

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Attorney for Apache Corporation