

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:

CASE NO. 11929

APPLICATION OF MOBIL EXPLORATION
& PRODUCING TX & NM INC. FOR THREE
HORIZONTAL INJECTION WELLS, AN
ADMINISTRATIVE PROCEDURE FOR
APPROVAL OF FUTURE HORIZONTAL
INJECTION WELLS, AND QUALIFICATION
OF THESE WELLS FOR THE RECOVERED
OIL TAX RATE, LEA COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This prehearing statement is submitted by Mobil Exploration & Producing TX & NM Inc. as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Ms. Shirley Houchins
Mobil Exploration & Producing TX & NM Inc.
500 West Illinois - Room 900
Midland, Texas 79701

ATTORNEY

Edmund H. Kendrick

OPPOSITION OR OTHER PARTY

None expected.

ATTORNEY

STATEMENT OF CASE

APPLICANT SEEKS:

- (1) Authorization to inject fresh water into three horizontal wells within the Mobil North Vacuum Abo Pressure Maintenance Project in Lea County;
- (2) Determination of an administrative procedure for consideration of future applications by Applicant for horizontal injection wells in the Project area;
- (3) Approval of the subject three horizontal injection wells as an expansion of an existing enhanced oil recovery project to qualify for the recovered oil tax rate under the Enhanced Oil Recovery Act; and
- (4) Certification of a positive production response for the expansion of the existing enhanced oil recovery project.

OPPOSITION OR OTHER PARTY

None expected.

PROPOSED EVIDENCE

APPLICANT

	WITNESSES	ESTIMATED TIME	EXHIBITS
(1)	Mark Meeks operations engineer	10 minutes	5 exhibits re history of Mobil North Vacuum Abo Pressure Maintenance Project
(2)	Chris Cuyler geologist	20 minutes	3 exhibits re proposed horizontal injection wells

(3) Marc Calvin
reservoir engineer

10 minutes

4 exhibits re EOR expansion
in support of tax rate under
the Enhanced Oil Recovery
Act

OPPOSITION


None expected.

PROCEDURAL MATTERS

None expected.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By 
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