

**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. 12271

APPLICATION OF TRIUMPH EXPLORATION, INC.  
FOR AMENDMENT OF DIVISION ORDER NO. R-9082 TO AUTHORIZE  
A TERTIARY RECOVERY PROJECT BY MICRO EMULSION FLOODING  
IN ITS TONTO LEASE PROJECT AREA, AND TO QUALIFY THIS  
PROJECT FOR THE RECOVERED OIL TAX RATE  
PURSUANT TO THE ENHANCED OIL RECOVERY ACT,  
LEA COUNTY, NEW MEXICO.

**PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Campbell, Carr, Berge & Sheridan, P.A.,  
as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Triumph Exploration  
Attn: Stella Swanson  
P.O. Box 10282  
Midland, TX 79702-7280  
(405) 982-1935 ext. 115  
name, address, phone and  
contact person

**ATTORNEY**

William F. Carr, Esq.  
Campbell, Carr, Berge & Sheridan, P.A.  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421

**OPPOSITION OR OTHER PARTY**

NM&O Operating Company  
6 East 5th Street, Suite 200  
Tulsa, OK 74103

**ATTORNEY**

James Bruce, Esq.  
Post Office Box 1056  
Santa Fe, NM 87504

OCT 14 AM 3:40  
OIL CONSERVATION DIVISION

## **STATEMENT OF CASE**

### **APPLICANT**

Applicant seeks approval to institute a secondary recovery project in its Tonto Lease Project Area by micro emulsion flooding of the Yates-Seven Rivers formation in the South Tonto Yates-Seven Rivers Pool. This project area encompasses the SW/4, NE/2 SE/4 and the SE/4 SE/4 of Section 30, Township 19 South, Range 33 East. Applicant also seeks to qualify the project area for the recovered oil tax rate pursuant to the "New Mexico Enhanced Oil Recovery Act" (Sections 7-29-A-1 through 7-29-A-5, NMSA 1978). The lease is located approximately 24 miles west of Hobbs, New Mexico.

### **OPPOSITION OR OTHER PARTY**

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

**PROPOSED EVIDENCE**

APPLICANT

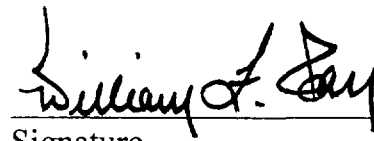
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Stella Swanson (Landman)	10 minutes	4 exhibits
Randall R. Foster (Petroleum Engineering)	20 minutes	3 exhibits
H.L. Atnipp (Petroleum Engineering)	15 minutes	0 exhibits

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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**PROCEDURAL MATTERS**

None at this time.

  
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Signature