

**STATE OF NEW MEXICO  
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES  
OIL CONSERVATION**

**IN THE MATTER OF THE APPLICATION  
OF CHEVRON U.S.A. PRODUCTION CO.  
FOR APPROVAL TO CONVERT THE  
EUNICE MONUMENT SOUTH UNIT WELLS  
210, 212, 222, 252 AND 258 TO INJECTION**

NO. 12320

01 OCTOBER 2011 DM  
00 FEB 28 AM 10:13

**PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by Doyle Hartman, Oil Operator ("Hartman") in accordance with Rule 1208.B.,19 NMAC 15.N, in opposition to the Application of Chevron U.S.A. Production Co. to convert certain Eunice Monument South Unit Chevron wells to injection wells.

**APPEARANCES OF PARTIES**

**APPLICANTS**

Chevron U.S.A. Production Co.  
Midland, Texas

**Attorneys**

William F. Carr  
Campbell, Carr, Berge & Sheridan  
P.O. Box 2208  
Santa Fe, NM 87504-2208

**PARTIES**

Doyle Hartman, Oil Operator

J.E. Gallegos  
Michael J. Condon  
Gallegos Law Firm, P.C.  
460 St. Michael's Drive, Bldg. 300  
Santa Fe, NM 87505  
(505) 983-6686

To Hartman's knowledge, no other party has entered an appearance or filed opposition in this matter.

**HARTMAN'S STATEMENT OF THE CASE**

Chevron purposes to convert five wells in the Eunice Monument South Unit waterflood to injector wells. Hartman is experiencing significant produced water in his Eumont gas wells within the boundaries of Chevron's waterflood. His position is set forth in a letter of November 15, 1999, a copy of which is attached hereto.

**PROPOSED EVIDENCE**

**HARTMAN**

**MAY-CALL  
WITNESSES  
(Name and Expertise)**

**ESTIMATED TIME**

**EXHIBITS**

Doyle Hartman  
Chemical Engineer or  
his designee.

15 min.

As needed for  
rebuttal

Respectfully submitted,

GALLEGOS LAW FIRM, P.C.

By   
J.E. GALLEGOS

MICHAEL J. CONDON

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Attorneys for Doyle Hartman, Oil  
Operator

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused a true and correct copy of the foregoing to be faxed and mailed on this 28<sup>th</sup> day of February, 2000 to the following:

William F. Carr  
Paul Owen  
Campbell, Carr, Berge & Sheridan, P.A.  
P.O. Box 2208  
Santa Fe, NM 87504-2208

  
J. E. GALLEGOS