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. 12666

THE APPLICATION OF TEXLAND PETROLEUM-HOBBS, L.L.C., FOR APPROVAL OF A WATERFLOOD PROJECT FOR ITS HOBBS-UPPER BLINEBRY POOL COOPERATIVE WATERFLOOD AREA AND, QUALIFICATION OF SAID PROJECT FOR THE RECOVERED OIL TAX RATE PURSUANT TO THE ENHANCED OIL RECOVERY ACT, LEA COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP and Campbell & Carr, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT
Texland Petroleum-Hobbs, L.L.C.
Attention: James Wilkes
500 Throckmorton, Suite 3100
Fort Worth, Texas 76102
(817) 336.2751

ATTORNEY William F. Carr, Esq. Holland & Hart LLP and Campbell & Carr Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988.4421 Pre-Hearing Statement NMOCD Case No. 12666 Page 2

STATEMENT OF CASE

APPLICANT

Applicant seeks approval of its Hobbs-Upper Blinebry Pool Cooperative Waterflood Area for injection of water into the Blinebry formation, Hobbs-Upper Blinebry Pool through fifteen injection wells located in the following described area:

TOWNSHIP 18 SOUTH, RANGE 38 EAST, NMPM

Section 28: S/2

Section 29: SW/4, S/2 SE/4, NW/4 SE/4, SW/4 NW/4, S/2 NW/4 NW/4

Section 30: SE/4, S/2 NE/4

Section 31: NE/4

Section 32: N/2, N/2 SW/4

Section 33: NW/4, N/2 NE/4, SE/4 NE/4, NE/4 SE/4

The applicant requests that the Division establish procedures for the administrative approval of additional injection wells within the project area without the necessity of further hearings and the adoption of such other provisions as are necessary for said waterflood operations. Applicant further seeks to qualify the project area for the Recovered Oil Tax Rate pursuant to the "New Mexico Enhanced Oil Recovery Act" (Laws 1992, Chapter 38, Sections 1 through 5). Said unit straddles the city limits on the west side of Hobbs, New Mexico.

PROPOSED EVIDENCE

APPLICANT

WITNESSES ESTIMATED TIME EXHIBITS

(Name and Expertise)

Jim Wilkes (Petroleum Approx. 30 Minutes Approx. 7

Engineer)

Pre-Hearing Statement NMOCD Case No. 12666 Page 3

PROCEDURAL MATTERS

Texland Petroleum-Hobbs, L.L.C., has none at this time.

Villiam F. Carr

Attorney for Texland Petroleum-Hobbs, L.L.C.