

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 POGO PRODUCING COMPANY
FOR A PILOT PRESSURE MAINTENANCE
PROJECT, ETC., EDDY COUNTY, NEW MEXICO.

Case No. 13022

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Pogo Producing Company
P.O. Box 10340
Midland, Texas 79702

Attention: R. Scott McDaniel
(915) 685-8121

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

OPPONENT

Yates Petroleum Corporation

William F. Carr

STATEMENT OF THE CASE

APPLICANT

Applicant seeks approval to institute a pilot pressure maintenance project in the Lost Tank-Delaware Pool on State Lease LH-1523, comprising the SE¼ of Section 2, Township 22 South, Range 31 East, NMPM, by the injection of water into the State "2" Well No. 5, located in Unit P of Section 2. Applicant further seeks to qualify the project for the recovered oil tax rate pursuant to the "New Mexico Enhanced Oil Recovery Act" (Laws 1992, Chapter 38, Sections 1 through 5).

OPPONENT

See the Pre-Hearing Statement of Yates Petroleum Corporation.

PROPOSED EVIDENCE**APPLICANT**

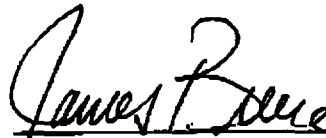
| <u>WITNESSES</u> | <u>EST. TIME</u> | <u>EXHIBITS</u> |
|-----------------------------|------------------|-----------------|
| Leslyn Wallace (landman) | 5 min. | Two |
| Tom Gentry (engineer) | 25 min. | Six |

OPPONENT

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

PROCEDURAL MATTERS

-None-




James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Pogo Producing Company

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading was served upon the following counsel of record this 9th day of March, 2003, by facsimile transmission:

William F. Carr
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421



James Bruce

**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. 13022

**APPLICATION OF POGO PRODUCING COMPANY
FOR APPROVAL OF A PILOT PRESSURE
MAINTENANCE PROJECT AND TO QUALIFY THE
PROJECT FOR THE RECOVERED OIL TAX RATE
PURSUANT TO THE ENHANCED OIL RECOVERY
ACT, EDDY COUNTY, NEW MEXICO.**

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Oil Conservation Division

PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

OPPOSITION

Yates Petroleum Corporation
Attn: Dr. David Boneau
105 South Fourth Street
Artesia, New Mexico 88210-2118
(505) 748-4172

ATTORNEY

William F. Carr, Esq.
Holland & Hart LLP and Campbell & Carr
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

STATEMENT OF CASE

OPPOSITION

Yates Petroleum Corporation is opposed to the institution of the pilot pressure maintenance project as proposed by Pogo Producing Company in the Lost Tank-Delaware Pool on State Lease LH-1523, comprising the SE/4 of Section 2, Township 22 South, Range 31 East, by the injection of water into the State "2" Well No. 5, located in Unit P of Section 2.

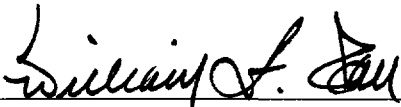
PROPOSED EVIDENCE

APPLICANT

| WITNESSES (Name and Expertise) | ESTIMATED TIME | EXHIBITS |
|-----------------------------------|--------------------|-----------|
| David Boneau (Petroleum Engineer) | Approx. 15 Minutes | Approx. 4 |

PROCEDURAL MATTERS

Yates Petroleum Corporation has none at this time.



William F. Carr
Attorney for Yates Petroleum Corporation

CERTIFICATE OF SERVICE

I certify that on March 7, 2003 I served a copy of the foregoing document to the following by

| | |
|-------------------------------------|----------------------------|
| <input type="checkbox"/> | U.S. Mail, postage prepaid |
| <input type="checkbox"/> | Hand Delivery |
| <input checked="" type="checkbox"/> | Fax |

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By: 

William F. Carr