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. 6580 (REOPENED)

APPLICATION OF CONOCO, INC. FOR AMENDMENT OF ORDER NO. R-6157 AND DIVISION ADMINISTRATIVE ORDER PMX-153, MALJAMAR CARBON DIOXIDE INJECTION PROJECT, LEA COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by CONOCO, INC. as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT (name, address, phone and contact person)

ATTORNEY

Conoco, Inc. 10 Desta Drive West Midland, TX 79705 Attn: Jerry Hoover (915) 686-5422

W. Thomas Kellahin KELLAHIN, KELLAHIN & AUBREY P.O. Box 2265 Santa Fe, New Mexico 87504 (505) 982-4285

OPPOSITION OR OTHER PARTY ATTORNEY (name, address, phone and contact person)



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OIL CONSERVATION DIV. SANTA FE

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STATEMENT OF CASE

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

Conoco, Inc. seeks to reopen Division Case No. 6580 concerning its previously approved Carbon Dioxide Injection Pilot Project and to amend Order No. R-6157 and Administrative Order PMX-153 to authorize, retroactively, the injection of recycled produced hydrocarbon gases, $\rm CO_2$ and water into the Maljamar Grayburg-San Andres Pool in order to continue the effective and efficient operation of the MCA Pressure Maintenance Project and the economic recovery of oil production from the reservoir.

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.)

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PROPOSED EVIDENCE

APPLICANT

WITNESSES EST. TIME EXHIBITS (name and expertise)

Robert Beamer (PE) 40-50 Min. 21

OPPOSITION

WITNESSES EST. TIME EXHIBITS (name and expertise)

PROCEDURAL MATTERS

(Please identify any procedural matters which need to be resolved prior to the hearing)

KELLAHIN, KELLAHIN & AUBREY

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