

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. 10288

APPLICATION OF PHILLIPS PETROLEUM
COMPANY FOR A PRESSURE MAINTENANCE
PROJECT AND A SPECIAL OIL PRODUCING
ALLOWABLE, EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by PHILLIPS
PETROLEUM COMPANY as required by the Oil Conservation
Division.

APPEARANCE OF PARTIES

APPLICANT
(name, address, phone
and contact person)

Phillips Petroleum Company
4001 Penbrook
Odessa, Texas 79762
Attn: Jeff Hargrove
(915) 368-1308

ATTORNEY

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

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

ATTORNEY

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APR 12 1991
OIL CONSERVATION DIV.
SANTA FE

STATEMENT OF CASE

APPLICANT

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

Phillips Petroleum Company seeks authority to institute a pressure maintenance project on its James "A" State Lease underlying Lots 1 through 4, S/2N/2, N/2SW/4, SE/4SW/4, and SE/4 of Section 2, T22S, R30E, by the injection of water into the Cabin Lake-Delaware Pool, through a perforated interval from approximately 5600 feet to 7400 feet in a well to be drilled 1250 feet FSL and 1150 feet FEL (Unit P) of said Section 2. Applicant further seeks a special oil producing allowable whereby any well in the project area could produce its ability and would not be subject to the depth bracket allowable for said pool.

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
Jeff Hargrove (PE)	30 Min.	Well performance data Stimulation results C-108 and attachment

OPPOSITION

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

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

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin