

ADMISSION
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*LICENSED IN ARIZONA ONLY

June 4, 1991

Mr. William J. LeMay, Director
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Re: Application of Burnett Oil Company, Inc. for
the Expansion of the Gissler "B" No. 11
Waterflood, Eddy County, New Mexico, Case
No. 10326

Dear Mr. LeMay:

Enclosed for filing, please find three copies of the Pre-hearing
Statement of Burnett Oil Co., Inc. for filing in the above-refer-
enced case.

Very truly yours,

LOSEE, CARSON, HAAS & CARROLL, P.A.



Ernest L. Carroll

ELC:kth
Enclosures

**BEFORE THE OIL CONSERVATION COMMISSION
OF THE STATE OF NEW MEXICO**

IN THE MATTER OF THE APPLICATION OF	:	
BURNETT OIL COMPANY, INC. FOR THE	:	CASE NO. 10326
EXPANSION OF THE GISSLER "B" NO. 11	:	
WATERFLOOD PROJECT, EDDY COUNTY,	:	
NEW MEXICO	:	

PRE-HEARING STATEMENT

This prehearing statement is submitted by BURNETT OIL COMPANY, INC., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Burnett Oil Co., Inc.
801 Cherry Street
Fort Worth, Texas 76102
(817)332-5108

ATTORNEY

Ernest L. Carroll
Losee, Carson, Haas & Carroll, P.A.
P. O. Drawer 239
Artesia, New Mexico 88211-0239
(505)746-3505

OPPOSITION OR OTHER PARTY

ATTORNEY

None known

STATEMENT OF CASE

Applicant is the operator of the Grayburg and Lovington Sands of the San Andres formation underlying Sections 11, 12 and 14, Township 17 South, Range 30 East, N.M.P.M., Eddy County, New Mexico, and proposes to expand its Gissler "B" No. 11 Waterflood Project. Applicant seeks authority to expand its waterflood project as an expansion of its secondary recovery efforts because the wells on Applicant's leases have been essentially depleted by primary means, and seeks authority for injection of water into the Grayburg and Lovington sands of the San Andres Formation, through its Gissler "A" #12 and #13 wells as specified in the Application.

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

John McPhaul, Engineering Consultant

30 min.


9

OPPOSITION

Unknown

BURNETT OIL COMPANY, INC.

By:


Ernest L. Carroll
Losee, Carson, Haas & Carroll, P. A.
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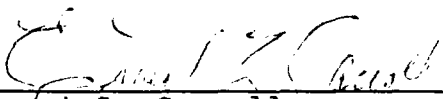
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