

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

RECEIVED

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
DIVISION FOR THE PURPOSE OF
CONSIDERING:

JUL 05 1991

OIL CONSERVATION DIV.
SANTA FE

CASE NO. 10347

APPLICATION OF WARRIOR, INC. FOR
A WATERFLOOD PILOT PROJECT,
LEA COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

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

APPEARANCE OF PARTIES

APPLICANT
(name, address, phone
and contact person)

ATTORNEY

Unique Engineering
P.O. Box 5970
Hobbs, New Mexico 88241
Attn: M.Y. Merchant
(505) 397-3596

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

STATEMENT OF CASE

APPLICANT

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

Warrior, Inc. seeks to institute a leasehold waterflood project on a portion of its Federal "D" lease by the injection of water into the Eumont Oil & Gas Pool in order to recover secondary oil which may not be recovered in the absence of waterflood operations.

Warrior requests an administrative procedure be established for the waterflood project area to allow for the amendment of the location of either injection or producing wells in the event such changes in location are deemed necessary.

PROPOSED EVIDENCE

APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
M.Y. Merchant (PE)	30-45 Min.	C-108 w/ attachments geologic interpretation

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: 

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