

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

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

CASE NO. 10369

APPLICATION OF ARCO OIL & GAS COMPANY  
FOR AN ORDER CONCERNING ITS EMPIRE-ABO  
PRESSURE MAINTENANCE PROJECT AND  
THE OXY U.S.A., INC. CITGO EMPIRE-ABO  
PRESSURE MAINTENANCE PROJECT AND TO  
AMEND DIVISION ORDER NO. R-4808,  
EDDY COUNTY, NEW MEXICO.

RECEIVED

AUG 10 1991

OIL CONSERVATION DIVISION

**PRE-HEARING STATEMENT**

This Pre-hearing Statement is submitted by William F. Carr, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

ARCO Oil & Gas Company\_\_\_\_\_  
c/o Gary Smallwood\_\_\_\_\_  
Post Office Box 1610\_\_\_\_\_  
Midland, Texas 79702 \_\_\_\_\_

name, address, phone and  
contact person

**ATTORNEY**

William F. Carr\_\_\_\_\_  
Campbell, Carr, Berge & Sheridan, P.A.  
Post Office Box 2208\_\_\_\_\_  
Santa Fe, New Mexico 87504\_\_\_\_\_  
(505) 988-4421\_\_\_\_\_

**OPPOSITION OR OTHER PARTY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

name, address, phone and  
contact person

**ATTORNEY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**STATEMENT OF CASE**

**APPLICANT**

ARCO Oil and Gas Company, applicant in the above-captioned cause seeks an order shutting in the Citgo Empire-Abo Unit until Citgo's current overproduction has been made up and also seeks a restriction on future allowable to the Citgo Unit to assure that it is not produced at a rate which will damage the Arco Empire-Abo Unit. ARCO opposes the relief proposed by Citgo in companion Case No. 10356 on the grounds that what OXY proposes violates the Orders governing operation of the Citgo Unit and will damage ARCO's pressure maintenance project in the Empire Abo Unit.

**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**

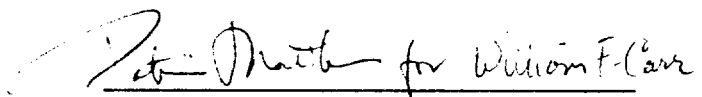
**APPLICANT**

| <b>WITNESSES<br/>(Name and expertise)</b> | <b>EST. TIME</b> | <b>EXHIBITS</b>  |
|---|------------------|------------------|
| Gary Smallwood, Petroleum Engineer        | 1 Hour           | Approximately 25 |

**OPPOSITION**

| <b>WITNESSES<br/>(Name and expertise)</b> | <b>EST. TIME</b> | <b>EXHIBITS</b> |
|---|------------------|-----------------|
|---|------------------|-----------------|

**PROCEDURAL MATTERS**

  
\_\_\_\_\_  
Signature