

**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. 10401

IN THE MATTER OF THE APPLICATION  
OF TEXACO EXPLORATION & PRODUCTION,  
INC., FOR A SECONDARY RECOVERY PROJECT,  
LEA COUNTY, NEW MEXICO.

RECEIVED

OCT 11 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**

Texaco Exploration & Production, Inc.  
c/o Scott Warhover\_\_\_\_\_  
205 East Bender Blvd.\_\_\_\_\_  
Hobbs, New Mexico 88240\_\_\_\_\_  
(505) 393-7191\_\_\_\_\_

**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**

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\_\_\_\_\_  
\_\_\_\_\_  
Telephone:\_\_\_\_\_

**ATTORNEY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Telephone:\_\_\_\_\_

name, address, phone and  
contact person

**STATEMENT OF CASE**

**APPLICANT**

Texaco Exploration & Production, Inc., applicant, seeks approval to institute either a pressure maintenance or waterflood pilot project, whichever is deemed applicable pursuant to Division General Rule 701 on its New Mexico State "AT" and New Mexico State "AN" Leases comprising Sections 15 and 22, Township 14 South, Range 33 East, by the injection of water into the Saunders-Permo Upper Pennsylvanian Pool through four certain producing wells to be converted to injection.

**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**

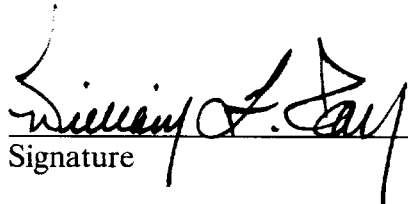
**APPLICANT**

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Michael L. Pierce, Geologist	20 Min.	Approximately 5

**OPPOSITION**

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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**PROCEDURAL MATTERS**

  
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Signature