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OCT 25 1991

OIL CONSERVATION DIVISION

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: Secondary Recovery Project, CASE NO. 10406
Lea County, New Mexico

APPLICATION OF
Amoco Production Company

PRE-HEARING STATEMENT

This prehearing statement is submitted by Ernest L. Padilla, Esq. as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Amoco Production Company
P. O. Box 3092
Houston, Texas 77253

ATTORNEY

William F. Carr
Post Office Box 2208
Santa Fe, N. M. 87504

OPPOSITION OR OTHER PARTY

John H. Hendrix Corporation
223 West Wall Street, Ste. 525
Midland, Texas 79701

Daniel Veirs

ATTORNEY

Ernest L. Padilla
PADILLA & SNYDER
Post Office Box 2523
Santa Fe, N. M. 87504
(505)988-7577

Pre-hearing Statement
NMOCD Case No. 10406
Page 2

STATEMENT OF CASE

APPLICANT

(Concise statement of what is being sought with this application and the reasons therefore.)

OPPOSITION OR OTHER PARTY

(Concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

Appearance only.

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

(Identify any procedural matters which
need to be resolved prior to the hearing.)

A handwritten signature in black ink, appearing to read "Ernest L. Padilla", written over a horizontal line.

Ernest L. Padilla

Hearing Date: October 31, 1991

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

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

CASE NO. 10406

APPLICATION OF Amoco Production Company For A Secondary Recovery Project.

PRE-HEARING STATEMENT

This prehearing statement is submitted by Amoco Production Company
as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Amoco Production Company
Daniel R. Currens
Room 5.170, P. O. Box 3092
Houston, Texas 77253
(713)556-3246
name, address, phone and
contact person

ATTORNEY

William F. Carr
Daniel R. Currens

OPPOSITION OR OTHER PARTY

name, address, phone and
contact person

ATTORNEY

STATEMENT OF CASE

APPLICANT

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

Amoco Production Company seeks approval to commence a water-injection, secondary-recovery project in the Fowler-Upper Yeso Pool, Bea County, N.M.

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

Dan Janik

30 Minutes

Approximately 5 - 10

OPPOSITION

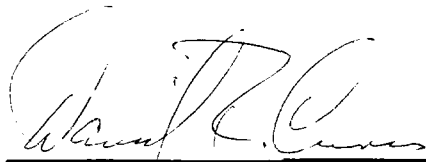
WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

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


Signature