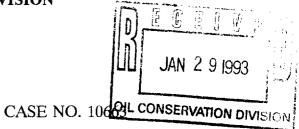
# STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

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



APPLICATION OF UNION OIL COMPANY OF CALIFORNIA d/b/a UNOCAL FOR AN ADMINISTRATIVE DOWNHOLE COMMINGLING PROCEDURE WITHIN THE RINCON UNIT AREA, RIO ARRIBA COUNTY, NEW MEXICO.

#### PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted by Campbell, Carr, Berge & Sheridan, P.A., as required by the Oil Conservation Division.

#### APPEARANCES OF PARTIES

## **APPLICANT ATTORNEY** Union Oil Company of California William F. Carr, Esq. Campbell, Carr, Berge & Sheridan, P.A. d/b/a Unocal Post Office Box 2208 3300 North Butler, Suite 200 Farmington, New Mexico 87401 Santa Fe, New Mexico 87504 Attn: Bill Irwin (505) 326-7600 (505) 988-4421 name, address, phone and contact person OPPOSITION OR OTHER PARTY **ATTORNEY** name, address, phone and contact person

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#### STATEMENT OF CASE

#### **APPLICANT**

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

Union Oil Company of California d/b/a Unocal, applicant in the above-captioned cause, seeks approval to commingle gas production from the Blanco-Mesaverde Pool or the Largo-Gallup Pool or Undesignated Gallup production with production from the Basin-Dakota Pool in the wellbores of existing and subsequently drilled wells within the Rincon Unit Area located in portions of Township 26 and 27 North, Ranges 6 and 7 West.

#### 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.)

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### PROPOSED EVIDENCE

## **APPLICANT**

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
David Johnson, Landman	30 Min.	Approximately 7
Dan Seamount, Geologist	15 Min.	Approximately 7
William L. Irwin, Engineer	20 Min.	Approximately 6

## **OPPOSITION**

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

## PROCEDURAL MATTERS

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

Signature