BEFORE THE

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF MARATHON OIL COMPANY FOR ESTABLISHMENT OF A TEMPORARY TESTING ALLOWABLE, VACUUM-DRINKARD POOL, LEA COUNTY, NEW MEXICO.



CASE NO. 10667

ENTRY OF APPEARANCE

COMES NOW CAMPBELL, CARR, BERGE & SHERIDAN, P.A., and hereby enters its appearance in the above referenced case on behalf of Texaco Exploration and Production Inc.

Respectfully submitted,

CAMPBELL, CARR, BERGE & SHERIDAN, P.A.

WILLIAM F. CARR Post Office Box 2208

Santa Fe, New Mexico 87504

Telephone: (505) 988-4421

ATTORNEYS FOR TEXACO EXPLORATION AND PRODUCTION INC.

CERTIFICATE OF MAILING

I hereby certify that I have caused to be mailed a copy of our Entry of Appearance in the above-captioned case on this 11 day of February, 1993 to:

W. Thomas Kellahin, Esq. Kellahin & Kellahin Post Office Box 2265 Santa Fe, New Mexico 87504

William F. Carr

ENTRY OF APPEARANCE, PAGE 2

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February 12, 1993

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OIL CONSERVATION DIVISION

*NOT LICENSED IN NEW MEXICO

VIA HAND DELIVERY

Florene Davidson Oil Conservation Division 310 Old Santa Trail Santa Fe, New Mexico 87503

> Case No. 10,667 Re:

Dear Florene:

Enclosed are the original and two copies of a Pre-Hearing Statement submitted by Exxon Corporation.

Very truly yours,

HINKLE, COX, EATON, COFFIELD

& HENSLEY-

James Bruce

JB:frs Enclosures

JGB5\93350.c

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. 10667

A DOMESTICATE

APPLICATION OF MARATHON OIL COMPANY FOR ESTABLISHMENT OF A TEMPORARY TESTING ALLOWABLE, VACUUM-DRINKARD POOL, LEA COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT	ATTORNEY
Marathon Oil Company	W. Thomas Kellahin, Esq Kellahin & Kellahin Post Office Box 2265 Santa Fe, New Mexico 87504 (505) 982-4285
name, address, phone and contact person	
OPPOSITION OR OTHER PARTY	ATTORNEY
Texaco Exploration & Production	William F. Carr, Esq Campbell, Carr, Berge & Sheridan, P.A. Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421
contact person	

Pre-hearing Statement NMOCD Case No. 10667 Page 2

STATEMENT OF CASE

<u>APPLICANT</u>

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

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.)

Texaco Exploration & Production Inc. opposes this application because this proposal could result in drainage from offsetting Texaco acreage, could damage the reservoir, sets a bad precedent and is unnecessary.

Pre-hearing Statement NMOCD Case No. 10667 Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES

EST. TIME

EXHIBITS

(Name and expertise)

Mark Wilkins, Petroleum Engineer (or other petroleum engineer)

10 min.

Approximately 1

PROCEDURAL MATTERS

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

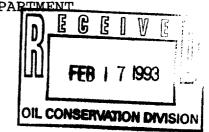
Signature L. Signature

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. 10667

APPLICATION OF MARATHON OIL COMPANY FOR THE ESTABLISHMENT OF A TEMPORARY TESTING ALLOWABLE, VACUUM-DRINKARD OIL POOL, LEA COUNTY, NEW MEXICO



PRE-HEARING STATEMENT

This pre-hearing statement is submitted by MARATHON OIL COMPANY as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

ATTORNEY

MARATHON OIL COMPANY P.O. Box 552 Midland, TX 79702 ATTN: Thomas C. Lowry, Esq. Santa Fe, NM 87504

W. Thomas Kellahin KELLAHIN AND KELLAHIN P.O. Box 2265 (505) 982-4285

OPPOSITION OR OTHER PARTY (Name, Address, and Phone)

ATTORNEY

Texaco, Inc.

William F. Carr Campbell, Carr, Berge &

Sheridan

Exxon Company, USA

James Bruce

Hinkle, Cox, Eaton, Coffield

& Hensley

Pre-Hearing Statement Case No. 10667 Page 2

STATEMENT OF CASE

APPLICANT

Marathon Oil Company ("Marathon") seeks an order establishing a special testing allowable for its Warn State a/c 2 Lease Project, comprising the W/2 of Section 6, Township 18 South, Range 35 East, NMPM, Vacuum-Drinkard Pool, for a maximum period of six months at a maximum rate equal to the capacity of each well within the project to produce oil from said pool.

Marathon seeks this temporary testing allowable for the purpose of gathering data to determine: 1) the most efficient producing rate for this particular reservoir or portion thereof; and 2) the feasibility of a pressure maintenance project for the Project Area through the determination of pore volume, inter-well communication and the existence of free gas saturation.

OPPOSITION OR OTHER PARTY

See Opposition or Other Party Filings

Pre-Hearing Statement Case No. 10667 Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES EST. TIME EXHIBITS

Craig Kent 30 Minutes Approx. 3
Petroleum Engineer

John Chapman 30 Minutes Approx. 5
Geologist

OPPOSITION OR OTHER PARTY

WITNESSES EST. TIME EXHIBITS

See Opposition or Other Party Filing

PROCEDURAL MATTERS

None applicable at this time.

Respectfully Submitted,

By: W. Thomas Kellahin

KELLAHIN AND KELLAHIN

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