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

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

CASE NO. 10879

APPLICATION OF TEXACO EXPLORATION AND PRODUCTION INC. FOR DOWNHOLE COMMINGLING, LEA COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

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Texaco Exploration & Production Inc.

name, address, phone and contact person

OPPOSITION OR OTHER PARTY

ATTORNEY

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

ATTORNEY

name, address, phone and contact person

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STATEMENT OF CASE

APPLICANT

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

Texaco Exploration and Production, Inc., applicant, seeks approval to downhole commingle Jalmat and Langlie Mattix oil production within seven certain wells (two existing and five to be drilled) in its Cooper Jal Unit located in Sections 13 and 24, Township 24 South, Range 36 East and Section 19, Township 24 South, Range 37 East.

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

<u>APPLICANT</u>

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WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Jim Ohlms, Petroleum Engineer	15 Min.	Approximately 7

OPPOSITION

WITNESSES (Name and expertise) EST. TIME

EXHIBITS

PROCEDURAL MATTERS

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

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