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. 9965

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APPLICATION OF

PHILLIPS PETROLEUM COMPANY for Carbon Dioxide Injection Pressure Maintenance Project, Lea County New Mexico

PHILLIPS PETROLEUM COMPANY'S PRE-HEARING STATEMENT

This prehearing statement is submitted by <u>W. Thomas Kellahin</u> as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Phillips Petroleum Company 4001 Penbrook

Odessa Texas 79762

<u>Att: Mr. W. J. Mueller</u> (915)367-1313

name, address, phone and contact person

OPPOSITION OR OTHER PARTY

None

name, address, phone and contact person W. Thomas Kellahin

James L. Gallogly, Esq. — Phillips Petroleum Company Odessa (915) 367-1278

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ATTORNEY

Pre-hearing Statement NMOCD Case No. 9965 Page 2

STATEMENT OF CASE

APPLICANT

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

Applicant seeks authority to conduct a pilot pressure maintenance project involving the injection of carbon dioxide into the Leamex Paddock Pool, being parts of Section 21, 22, 27, 28 of T17S, R33E, Lea County N.M.

Civision Rule 701 E (2) requires all pressure maintenance projects to be set for hearing.

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.)

None expected

Pre-hearing Statement NMOCD Case No. 9965 Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)			EST. TIME		EXH	EXHIBITS	
Susan Courtright			35 Min.			c-108 + attachments	
·						structure map and cross section	
				. ·	· · ·		
OPPOSITION						· · · · ·	

WITNESSES (Name and expertise)

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EST. TIME

EXHIBITS

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

None anticipated

Signature

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION 2012 8 FH 12 30

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PHILLIPS PETROLEUM COMPANY for Carbon Dioxide Injection Pressure Maintenance Project, Lea County New Mexico

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PRE-HEARING STATEMENT

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<u>Att: Mr. W. J. Mueller</u> (915)367-1313

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OPPOSITION OR OTHER PARTY

None

name, address, phone and contact person

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ATTORNEY

W. Thomas Kellahin

P. O. Box 2265

----- Santa Fc, New Mexico 87504. (505)982-4285

ATTORNEY

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Pre-hearing Statement NMOCD Case No. 9965 Page 2

STATEMENT OF CASE

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

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Pre-hearing Statement NMOCD Case No. <u>9965</u> Page 3

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Signature