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OIL CONSERVATION DIV.
SANTA FE

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. 9972

APPLICATION OF GARY L. BENNETT
FOR PRESSURE MAINTENANCE PROJECT,
LEA COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by
KELLAHIN, KELLAHIN & AUBREY as required by the Oil
Conservation Division.

APPEARANCE OF PARTIES

APPLICANT
(name, address, phone
and contact person)

Gary L. Bennett
P.O. Box 16844
Lubbock, TX 79490
(806) 794-3368

ATTORNEY

W. Thomas Kellahin
Kellahin, Kellahin & Aubrey
P.O. Box 2265
Santa Fe, NM 87504
(505) 982-4285

OPPOSITION OR OTHER PARTY
(name, address, phone
and contact person)

ATTORNEY

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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.)

Gary L. Bennett seeks authority to establish a lease pressure maintenance project in the Penrose formation by injection of water into its Cavalcade Federal 21 No. 4 well and the production of hydrocarbons from its Cavalcade Federal 21 wells Nos. 1 and 3.

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
Gary L. Bennett (geologist)	40 min.	C-108 with attachments Structure map Isopach maps (3) Cross section Estimates of increased recovery by project

OPPOSITION

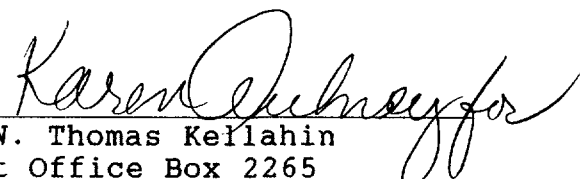
WITNESSES (name and expertise)	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

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

None.

KELLAHIN, KELLAHIN & AUBREY

By: 
W. Thomas Kellahin
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