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STATE OF NEW MEXICO
ENERGY MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
SANTA FE

IN THE MATTER OF THE APPLICATION
OF MOBIL PRODUCING TEXAS-NEW MEXICO, INC.
FOR DUAL COMPLETION AND DOWN HOLE
COMMINGLING LEA COUNTY, NEW MEXICO

Case No. 9999

IN THE MATTER OF THE APPLICATION
OF MOBIL PRODUCING TEXAS-NEW MEXICO, INC.
FOR A NEW WATER FLOOD PROJECT, DUAL
COMPLETIONS, WATER FLOOD EXPANSION
AND TWO UNORTHODOX WATER INJECTION
WELL LOCATIONS, LEA COUNTY, NEW MEXICO

Case No. 10,000

PRE-HEARING STATEMENT

COMES NOW the Applicant Mobil Producing Texas-New Mexico, Inc., by and through its attorneys, Montgomery & Andrews, P.A., and files this Pre-Hearing Statement covering the two captioned cases as required by the Oil Conservation Division.

Applicant will ask that the consideration and hearing of these two cases be consolidated.

APPEARANCES OF PARTIES

Applicant: Mobil Producing Texas-New Mexico, Inc.
Post Office Box 633
Midland, Texas 79702
Attention: Mark Moshell

Attorney: W. Perry Pearce
Montgomery & Andrews, P.A.
Post Office Box 2307
Santa Fe, New Mexico 87504-2307
(505) 982-3873

APPLICANTS STATEMENT OF THE CASE

In Case No. 9999 Applicant seeks permission of the Division to commingle production of the Vacuum Glorieta Pool and the

Vacuum Blinebry Pool in its Bridges State Well No. 36 located 660 feet from the North and West lines of Section 25, Township 17 South, Range 34 East. Applicant also seeks authority to dually complete this well with separate production from the Vacuum Grayburg-San Andres Pool.

In Case No. 10,000, Applicant seeks authority for a new water flood project, dual completion of certain wells and water flood expansion and two unorthodox water injection locations in the Vacuum Glorieta and Vacuum Blinebry Pool. Applicant seeks to institute a water flood project on its State Bridges lease in Township 17 South, Range 34 East.

APPLICANTS PROPOSED EVIDENCE

Applicant proposes to call in these consolidated cases Mr. Dan Burnham, a petroleum geologist and Mr. Mark Moshell, a petroleum engineer. These two witnesses will present exhibits both of a petroleum geology and petroleum engineering nature. These exhibits will include the materials submitted to the Division by way of application and will also include structural cross sections, stratigraphic cross sections, net pay isopacks, well location maps, a type log and displays of production information. It is estimated that the direct testimony of Mr. Moshell and Mr. Burnham will take from 45 minutes to one hour.

PROCEDURAL MATTERS

Applicant is not aware of any procedural questions which need to be resolved prior to the hearing.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By

A handwritten signature in dark ink, appearing to read 'W. Perry Pearce', written over a horizontal line.

W. Perry Pearce

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