

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: 10088 RECEIVED

APPLICATION OF CIRCLE RIDGE  
PRODUCTION INC. FOR WATERFLOOD  
EXPANSION, CHAVES COUNTY, NEW MEXICO.

SEP 5 1990

OIL CONSERVATION DIVISION

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Applicant as  
required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Circle Ridge Production, Inc.  
c/o Peak Consulting Services  
P. O. Box 636  
Hobbs, New Mexico 88240  
Attention: Michael L. Pierce  
(505) 392-1915

**ATTORNEY**

Hinkle, Cox, Eaton,  
Coffield & Hensley  
James Bruce  
500 Marquette, N.W.  
Suite 800  
Albuquerque, N.M. 87102  
(505) 768-1500

**OPPOSITION OR OTHER PARTY**

E. P. Caudill, Inc.

**ATTORNEY**

C. Barry Crutchfield  
2nd Floor, Reed McCorty  
Building  
Lovington, N.M. 88260  
(505) 396-4927

**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 re-inject water produced  
from the Queen formation into said formation through the Rock  
Queen Unit Well Nos. 3 (Unit C, Section 26) and 9 (Unit I,  
Section 27), T13S, R31E.

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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

WITNESS (Name and expertise)	EST. TIME	EXHIBITS
Michael C. Pierce	20 minutes	(a) C-108 (b) C-103's on the subject wells. (c) Notice documents.

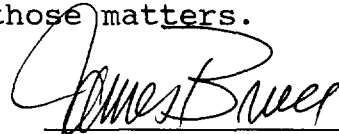
OPPOSITION

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)

Applicant objects to E.P. Caudill, Inc. presenting any evidence regarding trespass or surface damages. The Division lacks jurisdiction to hear those matters.

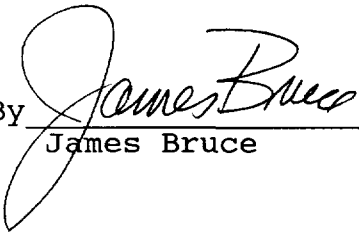


James Bruce  
Attorney for Applicants  
500 Marquette, N.W.  
Suite 800  
Albuquerque, New Mexico 87102  
(505) 768-1500

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Pre-Hearing Statement was telecopied and mailed to C. Barry Crutchfield, 2nd Floor, Reed McCory Building, Lovington, New Mexico 88260 this 4th day of September, 1990.

By

  
James Bruce