

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. 10220

APPLICATION OF CONOCO INC. TO AMEND  
DIVISION ORDER NO. R-6906 BY EXPANDING,  
CONTRACTING AND REDESIGNATING ITS  
CONOCO-SOUTHLAND BLINEBRY COOPERATIVE  
WATERFLOOD PROJECT, EXTEND THE VERTICAL  
LIMITS AND TO INCLUDE ADDITIONAL  
INJECTION WELLS INTO SAID PROJECT,  
LEA COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by CONOCO, INC.  
as required by the Oil Conservation Division.

**APPEARANCE OF PARTIES**

APPLICANT  
(name, address, phone  
and contact person)

Conoco Inc.  
10 Desta Drive West  
Midland, TX 79705  
(915) 686-5400  
Attn: Jerry Hoover

ATTORNEY

W. Thomas Kellahin  
KELLAHIN, KELLAHIN & AUBREY  
P.O. Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285

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

ATTORNEY

**RECEIVED**

JAN 18 1991

OIL CONSERVATION DIV.  
SANTA FE

**STATEMENT OF CASE**

APPLICANT

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

Conoco Inc. seeks to amend Division Order No. R-6906, which authorized the Conoco-Southland Blinebry Cooperative Waterflood Project by the injection of water into the Blinebry Oil and Gas Pool through nine wells located in Sections 33 and 34, T20S, R38E and in Sections 3 and 4, T21S, R38E. Applicant proposes to redesignate said project and reestablish its area to include the S/2S/2 of Section 22, all of Sections 26, 27, 33 and 34, and the N/2N/2 of Section 35, T20S, R38E. Applicant also seeks to extend the vertical limits of said project to include both the Blinebry and Tubb formations. Further, the addition of 20 injection wells into said project area will be considered.

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
Jerry Hoover (Regulatory Coordinator)	20 Min.	24 Exhibits total
John McCafferty (Senior Production Engineer)	40 Min.	Re: Attachments to Form C-108

OPPOSITION OR OTHER PARTY

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)

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin  
P.O. Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285