

**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. 10252

APPLICATION OF AMERADA HESS CORPORATION  
FOR A WATERFLOOD PROJECT,  
LEA COUNTY, NEW MEXICO.

**RECEIVED**

SEP 13 1991

**PRE-HEARING STATEMENT**

OIL CONSERVATION DIV.  
SANTA FE

This Prehearing Statement is submitted by William F. Carr, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Amerada Hess Corporation \_\_\_\_\_  
c/o Jim C. Hefley \_\_\_\_\_  
218 W. 6th Street \_\_\_\_\_  
Tulsa, Oklahoma \_\_\_\_\_  
(918) 599-4200 \_\_\_\_\_

name, address, phone and  
contact person

**ATTORNEY**

William F. Carr \_\_\_\_\_  
Campbell, Carr, Berge & Sheridan, P.A.  
Post Office Box 2208 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_  
(505) 988-4421 \_\_\_\_\_

**OPPOSITION OR OTHER PARTY**

Meridian Oil Inc. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

name, address, phone and  
contact person

**ATTORNEY**

W. Thomas Kellahin, Esq. \_\_\_\_\_  
Kellahin, Kellahin & Aubrey \_\_\_\_\_  
Post Office Box 2265 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_  
(505) 982-4285 \_\_\_\_\_

**STATEMENT OF CASE**

**APPLICANT**

Amerada Hess Corporation, applicant, seeks authority to institute a waterflood project on its proposed North Monument Grayburg/San Andres Unit Area (Division Case No. 10253) located in portions of Townships 19 and 20 South, Ranges 36 and 37 East, by the injection of water into the Eunice Monument Grayburg-San Andres Pool through 108 certain wells to either be recompleted or converted from producing or abandoned wells to water injection wells.

**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**

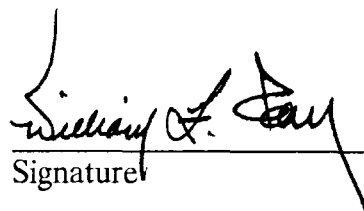
**APPLICANT**

<b>WITNESSES</b> (Name and expertise)	<b>EST. TIME</b>	<b>EXHIBITS</b>
William S. Holder, Landman	10 Min.	Approximately 3
James Almrud, Petroleum Engineer	20 Min.	Approximately 2
Gary Kline, Geologist	10 Min.	Approximately 2
Jeff Hermann, Petroleum Engineer	10 Min.	Approximately 2

**OPPOSITION**

<b>WITNESSES</b> (Name and expertise)	<b>EST. TIME</b>	<b>EXHIBITS</b>
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**PROCEDURAL MATTERS**

  
\_\_\_\_\_  
Signature

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

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CONSIDERING:

OIL CONSERVATION DIVISION

CASE NO. 10252

APPLICATION OF AMERADA HESS  
CORPORATION FOR APPROVAL OF THE  
NORTH MONUMENT GRAYBURG-SAN  
ANDRES UNIT WATERFLOOD, LEA  
COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

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

APPEARANCE OF PARTIES

APPLICANT  
(name, address, phone  
and contact person)

ATTORNEY

Amerada Hess Corporation

William F. Carr, Esq.  
Campbell & Black, P.A.  
P.O. Box 2208  
Santa Fe, NM 87504  
(505) 988-4421

Pre-hearing Statement  
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INTERESTED PARTY  
(name, address, phone  
and contact person)

Meridian Oil Inc.  
P.O. Box 51810  
Midland, TX 79710  
Attn: Mo Gaddis  
(915) 686-5784

ATTORNEY

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

#### STATEMENT OF CASE

##### APPLICANT

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

##### INTERESTED PARTY

(Please make a concise statement of the basis for opposing  
this application or otherwise state the position of the  
party filing this statement.)

Meridian Oil Inc. is an offset operator and is  
concerned about the potential effects the  
waterflood/statutory unitization project may have on its  
property.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES  
(name and expertise)

EST. TIME

EXHIBITS

INTERESTED PARTY

POTENTIAL WITNESSES  
(name and expertise)

EST. TIME

EXHIBITS

Mo Gaddis

**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

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

IN THE MATTER OF THE HEARING  
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NORTH MONUMENT GRAYBURG-SAN  
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COUNTY, NEW MEXICO

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PRE-HEARING STATEMENT

OIL CONSERVATION DIVISION

This pre-hearing statement is submitted by ARCO Oil &  
Gas Company as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

(name, address, phone  
and contact person)

Amerada Hess Corporation

ATTORNEY

William F. Carr, Esq.  
Campbell & Black, P.A.  
P.O. Box 2208  
Santa Fe, NM 87504  
(505) 988-4421

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INTERESTED PARTY  
(name, address, phone  
and contact person)

ARCO Oil & Gas Company  
P.O. Box 1610  
Midland, TX 79701  
Attn: Ron Sponberg, Esq.  
(915) 688-5734

ATTORNEY

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

#### STATEMENT OF CASE

##### APPLICANT

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

##### INTERESTED PARTY

(Please make a concise statement of the basis for opposing  
this application or otherwise state the position of the  
party filing this statement.)

ARCO Oil & Gas Company is an interested party in this  
matter and neither supports or opposes the case at this  
time.



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**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
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INTERESTED PARTY

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
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None.

**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