

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

RECEIVED

OCT 2 1980

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
DIVISION FOR THE PURPOSE OF
CONSIDERING:

OIL CONSERVATION DIVISION

Cases Nos: 10,102 and
10,103

APPLICATION OF SAGE ENERGY
COMPANY FOR A UNIT AGREEMENT
AND WATERFLOOD PROJECT, LEA
COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

Sage Energy Company
10101 Reunion Place, Suite 800
San Antonio, Texas 78216
(512) 340-2288
Attention: Mr. Lee Patrick

ATTORNEY

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

OPPOSITION OR OTHER PARTY

ATTORNEY

STATEMENT OF CASE

APPLICANT

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

Applicant seeks statutory unitization of the North Vacuum
(Abo) North Unit, and approval of the waterflood project for
the Unit, covering all or portions of Sections 35 and 36-16
South-34 East, and Sections 1, 2, and 12-17 South-34 East.

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

NOTE: This case was heard on October 3, 1990, and most of applicant's evidence was presented at that time. The case was continued because of notice defects.

APPLICANT

WITNESS (Name and expertise)	EST. TIME	EXHIBITS
Lee Patrick (Landman)	15 minutes	(a) Notice Letters (b) Ratifications
Jay Hardy (Engineer)		Mr. Hardy presented his testimony at the October 3, 1990 hearing, but will be available to answer questions for the Examiner.

OPPOSITION

WITNESS (Name and expertise)	EST. TIME	EXHIBITS
---------------------------------	-----------	----------

PROCEDURAL MATTERS

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

Respectfully Submitted,

HINKLE, COX, EATON, COFFIELD &
HENSLEY

By


James Bruce

500 Marquette, N.W.

Suite 800

Albuquerque, New Mexico 87102

(505) 768-1500

Attorneys for Applicant