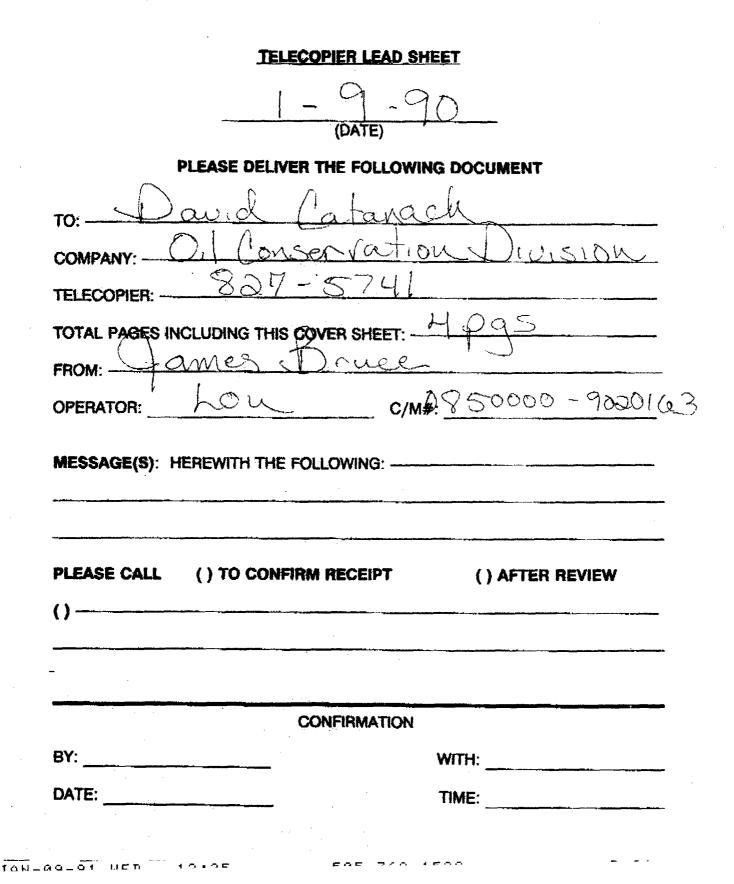


# HINKLE, COX, EATON, COFFIELD & HENSLEY

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# 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:

Cases Nos: 10,192 and 10,193

APPLICATION OF BEACH EXPLORATION INC. FOR STATUTORY UNITIZATION AND APPROVAL OF A WATERFLOOD, EDDY 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

#### ATTORNEY

Beach Exploration Inc. 800 North Marienfeld, Suite 200 Hinkle, Cox, Eaton, Midland, Texas 79701 (915) 683-6226 Attention: Mr. Carl Beach

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

OPPOSITION OR OTHER PARTY

ATTORNEY

# STATEMENT OF CASE

# APPLICANT

TON-00-01 HET

Applicant seeks statutory unitization of the Red Lake (Queen) Unit, in order to commit all interests to the Unit. In addition, Applicant seeks approval of a waterflood program for secondary recovery within the Unit.

OPPOSITION OR OTHER PARTY

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| Respectfully Submitted,  |
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| HINKLE, COX, EATON, COFFIELD &<br>HENSLEY  |
| By<br>Hames Bruce<br>500 Marquette, N.W.<br>Suite 800<br>Albuquerque, New Mexico 87102<br>(505) 768-1500 |
| U<br>Attorneys for Applicant   |
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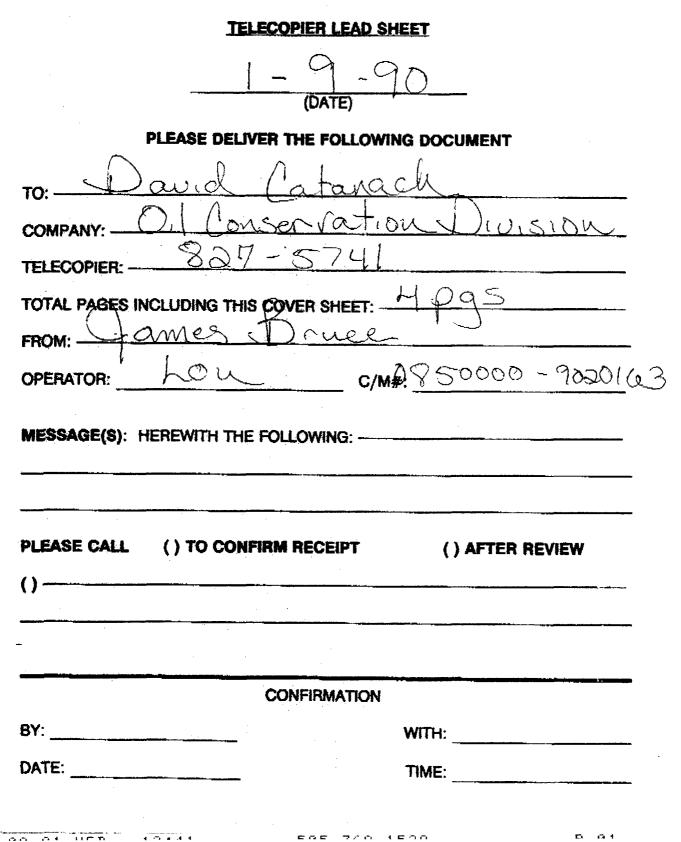
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|  | Pre-hearing Statemer<br>NMOCD Case Nos. 10,1<br>Page 2 | nt<br>192 and 10,193 |  |
|  |  | PROPOSED EVIDENC     | B  |
|  | APPLICANT  |                      |  |
| yanya ku ji ku | WITNESS  | EST. TIME            | EXHIBITS   |
|  | 1. Carl Beach<br>(Landman)                             | 20 minutes           | <ul> <li>(a) Land Plat</li> <li>(b) Operating<br/>Agreement</li> <li>(c) Unit Operating<br/>Agreement</li> <li>(d) Preliminary<br/>approval letters</li> <li>(e) Notice letters</li> </ul> |
|  | 2.   | 10 minutes           | (a) Structure Map  |
|  | (Geologist)<br>3. Hal Gill<br>(Engineer)               | 40 minutes           | (a) C-108<br>(b) Engineering data  |
|  | OPPOSITION   |                      |  |
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# TELECOPIER LEAD SHEET



# PLEASE DELIVER THE FOLLOWING DOCUMENT

| TO:        | David Catarach                     |
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| COMPANY: - | OIL Conservation Division          |
| TELECOPIER | 827-5741                           |
|            | S INCLUDING THIS COVER SHEET: 4995 |
|            | ames Druce                         |
| OPERATOR:  | Lou c/M# 850000 - 9020163          |

MESSAGE(S): HEREWITH THE FOLLOWING:

PLEASE CALL () TO CONFIRM RECEIPT () AFTER REVIEW

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

i.

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

> Cases Nos: 10,192 and 10,193

APPLICATION OF BEACH EXPLORATION INC. FOR STATUTORY UNITIZATION AND APPROVAL OF A WATERFLOOD, EDDY COUNTY, NEW MEXICO.

# PRE-HEARING STATEMENT

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

# APPEARANCES OF PARTIES

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#### ATTORNEY

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James Bruce 500 Marguette, N.W. Suite 800 Albuquerque, N.M. 87102 (505) 768-1500

OPPOSITION OR OTHER PARTY

ATTORNEY

## STATEMENT OF CASE

## APPLICANT

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Applicant seeks statutory unitization of the Red Lake (Queen) Unit, in order to commit all interests to the Unit. In addition, Applicant seeks approval of a waterflood program for secondary recovery within the Unit.

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OPPOSITION OR OTHER PARTY

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| N            | Pre-hearing Statement<br>MOCD Case Nos. 10,19<br>Page 2 | 2 and 10,193      |                                 |  |
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| 1            | L. Carl Beach<br>(Landman)                              | 20 minutes        | (a)<br>(b)<br>(c)<br>(d)<br>(e) | Agreement<br>Preliminary<br>approval letters |
| 2            | (Geologist)   | 10 minutes        | (a)                             | Structure Map                                |
| 3            | B. Hal Gill<br>(Engineer)                               | 40 minutes        | (a)<br>(b)                      | C-108<br>Engineering data                    |
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| Respectfully Submitted,<br>HINKLE, COX, EATON, COFFIELD &<br>HENSLEY<br>By<br>James Bruce<br>500 Marquette, N.W.<br>Suite 800<br>Albuquerque, New Mexico 87102<br>(505) 768-1500<br>Attorneys for Applicant |
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|             |              | PR   | OPOSED EVIDENCE |            |   |
|             | APPL]        | <u>ICANT</u>                                   |                 |            |   |
|             |              | WITNESS  | EST. TIME       | EXHI       | BITS  |
|             | 1.           | Carl Beach<br>(Landman)                        | 20 minutes      |            | Agreement<br>Preliminary<br>approval l <b>ett</b> ers |
|             | 2.           | (Geologist)                                    | 10 minutes      | (e)<br>(a) |   |
|             | 3.           | Hal Gill<br>(Engineer)                         | 40 minutes      | (a)<br>(b) | C-108<br>Engineerin <mark>g data</mark>               |
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