

**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. 10515

IN THE MATTER OF THE APPLICATION
OF TEXACO EXPLORATION AND PRODUCTION
INC., FOR STATUTORY UNITIZATION,
LEA COUNTY, NEW MEXICO.

RECEIVED

JUL 17 1992

OIL CONSERVATION DIVISION

PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

Texaco Exploration & Production, Inc.
c/o Mike Mullins _____
Post Office Box 3109 _____
Midland, Texas 79702 _____
(915) 688-4100 _____

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

Marathon Oil Company _____

Telephone: _____

ATTORNEY

W. Thomas Kellahin _____
Post Office Box 2265 _____
Santa Fe, New Mexico 87504 _____
Telephone: (505) 982-4285

name, address, phone and
contact person

STATEMENT OF CASE

APPLICANT

Texaco Exploration and Production, Inc., applicant in the above-styled cause, seeks an order unitizing, for the purpose of establishing a secondary recovery project, all mineral interests in the Vacuum-Glorieta Pool, underlying 2778.86 acres, more or less, of state and fee lands comprising portions of Townships 17 and 18 South, Ranges 34 and 35 East. Said unit is to be designated the Vacuum Glorieta West Unit. Among the matters to be considered at the hearing will be the necessity of unit operations; the designation of a unit operator; the determination of horizontal and vertical limits of the unit area; the determination of the fair, reasonable and equitable allocation of production and costs of production, including capital investment, to each of the various tracts in the unit area; the determination of credits and charges to be made among the various owners in the unit area for their investment in wells and equipment; and such other matters as may be necessary and appropriate for carrying on efficient unit operations; including but not limited to, unit voting procedures, selection, removal or substitution of unit operator, and time of commencement and termination of unit operations. Applicant also requests that any such order issued in this case include a provision for carrying any non-consenting working interest owner within the unit area upon such terms and conditions to be determined by the Division as just and reasonable.

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

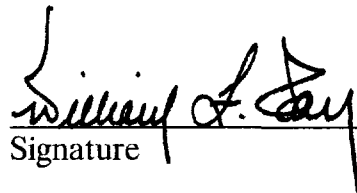
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Mike Mullins, Unitization Landman	15 Min.	Approximately 8
Robert N. Goon, Geologist	20 Min.	Approximately 6
Dan Dunham, Petroleum Engineer	25 Min.	Approximately 6

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

Texaco will request that this case be consolidated for the purpose of hearing with Case 10516.



Signature

**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. 10516

IN THE MATTER OF THE APPLICATION
OF TEXACO EXPLORATION AND PRODUCTION
INC., FOR A WATERFLOOD PROJECT,
LEA COUNTY, NEW MEXICO.

RECEIVED

JUL 11 1992

OIL CONSERVATION DIVISION

PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

Texaco Exploration & Production, Inc.
c/o Mike Mullins _____
Post Office Box 3109 _____
Midland, Texas 79702 _____
(915) 688-4100 _____

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

Marathon Oil Company _____

Telephone: _____

ATTORNEY

W. Thomas Kellahin _____
Post Office Box 2265 _____
Santa Fe, New Mexico 87504 _____
Telephone: (505) 982-4285 _____

name, address, phone and
contact person

STATEMENT OF CASE

APPLICANT

Texaco Exploration and Production, Inc., applicant in the above-styled cause, seeks authority to institute a waterflood project on its proposed Vacuum Glorieta West Unit Area (Division Case No. 10515) located in portions of Townships 17 and 18 South, Ranges 34 and 35 East, by the injection of water into the Vacuum-Glorieta Pool through one well to be converted from a producing oil well and fifty-nine proposed new injection wells to be drilled.

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

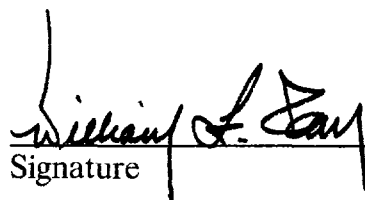
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Dan Dunham, Petroleum Engineer	10 Min.	Approximately 2

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

Texaco will request that this case be consolidated for the purpose of hearing with Case 10515.



Signature