HINKLE, COX, EATON, COFFIELD & HENSLEY

LEWIS C COX PAUL W E/TON CONRAD E COFFIELD PAROLD L HENSLEY, JR. STUART D SHANOR ERIC D. LA VPHERE C D. MART N C D. MART N
PAUL J. KELLY, JR.
ROBERT P. TINNIN, JR
MARSHALL G MARTIN
OWEN M LOPEZ
DOUGLAS I. LUNSFORD
JOHN J. KELLY
NICHOLAS J. NOEDING
T CALDER EZZELL, JR.
WILLIAM B BILIPPOPPT WILLIAM B. BURFORD* RICHARD E OLSON RICHARD F WILFONG* RICHARD E WILFONG*
THOMAS J. MCBRIDE
STEVEN D. ARNOLD
JAMES J. V'ECHSLER
NANCY S. C.USACK
JEFFREY L FORNACIARI
JEFFREY L HEWETT
JAMES REJICE

JAMES BRIJCE
JERRY F SHACKELFORD*
JEFFREY W HELLBERG* JEFFREY W. HELLBERG*
ALBERT L. PITS
THOMAS M. HNASKO
JOHN C. C. 14MBERS*
GARY D. COMPTON*
MICHAEL A. GROSS
THOMAS D. HAINES, JR.
ESEGORY L. NIBERDT GREGORY J. NIBERT DAVID T. MARKETTE* MARK C. D.W

*NOT LICENSED IN NEW MEXICO

KAREN M. RICHARDSON*
FRED W. SCHWENDIMANN
JAMES M. HUDSON
JEFFREY S. BAIRD*
MACDONNELL GORDON
REBECCA NICHOLS JOHNSON WILLIAM P. JOHNSON STANLEY K. KOTOVSKY, JR. H R. THOMAS KARA L. KELLOGG

BETTY H LITTLE*
RUTH S. MUSGRAVE
ELLEN S CASEY
S BARRY PAISNER
MARGARET CARTER LUDEWIG
STEPHEN M. CRAMPTON
MARTIN MEYERS
GREGORY S. WHEELER
ANDREW J. CLOUTIER
JAMES A. GILLESPIE
GARY W. LARSON
STEPHANE LANDRY STEPHANIE LANDRY JOHN R. KULSETH, JR. MARGARET R. MCNETT BRIAN T. CARTWRIGHT* LISA K. SMITH* JAMES KENT SCHUSTER* MOLLY MCINTOSH

ATTORNEYS AT LAW

218 MONTEZUMA

POST OFFICE BOX 2068

SANTA FE, NEW MEXICO 87504-2068

(505) 982-4554

FAX (505) 982-8623

CLARENCE E HINKLE (1901-1985) W. E. BONDURANT, JR. (1913-1973) ROY C. SNODGRASS, JR. (1914-1987)

JOE W. WOOD RICHARD S MORRIS

WASHINGTON, D.C. SPECIAL COUNSEL

December 2, 1992

700 UNITED BANK PLAZA POST OFFICE BOX IO ROSWELL, NEW MEXICO 88202 (505) 622-6510 FAX (505) 623-9332

2800 CLAYDESTA CENTER 6 DESTA DRIVE POST OFFICE BOX 3580 MIDLAND, TEXAS 79702 (915) 683-4691 FAX (915) 683-6518

1700 TEAM BANK BUILDING POST OFFICE BOX 9238 AMARILLO, TEXAS 79105 (806) 372-5569 FAX (806) 372-9761

500 MARQUETTE N.W., SUITE BOO POST OFFICE BOX 2043 ALBUQUERQUE, NEW MEXICO 87103 (505) 768-1500 FAX (505) 768-1529

RECEIVED

PROGRAMME

OIL CONSERVATION DIVISION

VIA HAND DELIVERY

Florene Davidson Oil Conservation Division 310 Old Santa Fe Trail Santa Fe, New Mexico 87503

Dear Florene:

Enclosed is an Entry of Appearance in Case Nos. 10,618 and I have not filed a Pre-Hearing Statement, but Santa Fe Energy does not plan on presenting any evidence at the hearings.

Very truly yours,

HINKLE, COX, EATON, COFFIELD & HENSLEY

∄ames Bruce

JB:frs Enclosure

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF SIETE OIL AND GAS COMPANY FOR STATUTORY UNITIZATION, EDDY COUNTY, NEW MEXICO.

Case No. 10,618

RECEIVED

and

DEC US 1949

APPLICATION OF SIETE OIL AND GAS COMPANY FOR APPROVAL OF A WATER FLOOD PROJECT, EDDY COUNTY, NEW MEXICO.

OIL CONSERVATION DIVISION Case No. 10,619

ENTRY OF APPEARANCE

Hinkle, Cox, Eaton, Coffield & Hensley hereby enters its appearance in the above cases on behalf of Santa Fe Energy Operating Partners, L.P.

HINKLE, COX, EATON, COFFIELD & HENSLEY

James Bruce

Post Office Box 2068

Santa Fe, New Mexico 87504-2068

(505) 982-4554

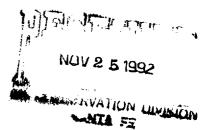
Attorneys for Santa Fe Energy Operating Partners, L.P.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Entry of Appearance was hand-delivered to Ernest L. Padilla, Esq., 200 West Marcy Street, Suite 216, Santa Fe, New Mexico 87501, this 2nd day of December, 1992.

James Bruce

JGB5\92717.p



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

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
COMMISSION FOR THE PURPOSE OF
CONSIDERING: Application of Siete
Oil & Gas Corporation For a Waterflood
Project, Eddy County, New Mexico

CASE NO. 10619

PRE-HEARING STATEMENT

This prehearing statement is submitted by <u>Ernest L.</u>
<u>Padilla, Esq.</u> as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Siete Oil & Gas Corporation Post Office Box 2523 Roswell, New Mexico 88202 (505) 622-2202

ATTORNEY

Ernest L. Padilla
PADILLA & SNYDER
Post Office Box 2523
Santa Fe, N. M. 87504
(505) 988-7577

OPPOSITION OR OTHER PARTY

ATTORNEY

Unknown

Pre-hearing Statement NMOCD Case No. 10619 Page 2

STATEMENT OF CASE

APPLICANT

(Concise statement of what is being sought with this application and the reasons therefore.)

Applicant requests approval of its proposed waterflood project in conjunction with its application for statutory unitization under Section 70-7-1 et seq. NMSA (1978). The waterflood project constitutes a method of enhanced recovery of hydrocarbons underlying the proposed unit area which will prevent waste through ultimate recovery of hydrocarbons which would not otherwise be recovered.

OPPOSITION OR OTHER PARTY

(Concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

Unknown

Pre-hearing Statement NMOCD Case No. 10619 Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Bruce Uszynski	45 min.	Geologic Report with Attachments
Robert Lee	1:15 min.	<pre>(1) C-108 (2) Engineering Report</pre>
Gene Shumante	45 min.	 (1) Compilation of Correspondence to Working Interest and Royalty Interest Owners (2) Unit Operating Agreement (3) Unit Agreement

OPPOSITION

WITNESSES (Name and expertise)

EST. TIME

EXHIBITS

Unknown

PROCEDURAL MATTERS
(Identify any procedural matters which need to be resolved prior to the hearing.)

Applicant will move for Consolidation of Case No. 10618 (Statutory Unitization) and Case No. 10619 (Waterflood Project).

Ernest L. Padilla

Hearing Date: December 3, 1992