

**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. 13386**

**APPLICATION OF MARBOB ENERGY CORPORATION  
FOR CONTRACTION OF THE EAST EMPIRE-YESO  
POOL AND EXTENSION OF THE HORIZONTAL  
BOUNDARIES AND THE VERTICAL LIMITS OF A  
PORTION OF THE GRAYBURG-JACKSON (SEVEN  
RIVERS-QUEEN-GRAYBURG-SAN ANDRES) POOL,  
EDDY COUNTY, NEW MEXICO.**

**2009 NOV 12 PM 12 28**

**PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Mr. Raye Miller  
Marbob Energy Corporation  
Post Office Box 227  
Artesia, New Mexico 88211-0227  
(505) 748-3303

**ATTORNEY**

William F. Carr, Esq.  
Holland & Hart LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
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**STATEMENT OF CASE**

**APPLICANT**

Applicant in the above-styled cause, seeks an order (i) contracting the boundaries of the East Empire-Yeso Pool to exclude the SW/4 and SE/4 SW/4 of Section 22, Township 17 South, Range 29 East, NMPM; (ii) Extending the boundaries of the Grayburg-Jackson (Seven Rivers-Queen-Grayburg-San Andres) Pool to include the NW/4 of Section 11, Township 17 South, Range 29 East, NMPM; and (iii) extending the vertical limits of the Grayburg-Jackson (Seven Rivers-Queen- Grayburg-San Andres) Pool to include the Glorieta Yeso (Paddock) formation in its proposed Dodd Federal Unit Area underlying 2400.00 acres, more or less, of Federal lands in the following acreage:

**TOWNSHIP 17 SOUTH, RANGE 29 EAST, NMPM**

Section 10:	E/2, E/2 W/2
Section 11:	All
Section 14:	All
Section 15:	E/2
Section 22:	SE/4, SE/4 SW/4, E/2 NE/4, SW/4 NE/4

**PROPOSED EVIDENCE**

**APPLICANT**

<b>WITNESSES</b> <b>(Name and Expertise)</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Raye Miller (Practical Land Man)	Approx. 30 Minutes	Approx. 14

**PROCEDURAL MATTERS**

Marbob Energy Corporation will request that this case be consolidated for the purpose of hearing with Case No. 13386.

A handwritten signature in black ink, appearing to read "William F. Carr", is written over a horizontal line.

William F. Carr  
Attorney for Marbob Energy Corporation