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

## APPLICATION OF PALADIN ENERGY CORPORATION FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

### Case No. 13375

#### **APPLICANT'S PRE-HEARING STATEMENT**

Applicant hereby submits this Pre-Hearing Statement pursuant to the rules of the Oil

Conservation Division.

### **APPEARANCES**

### **APPLICANT**

#### <u>ATTORNEY</u>

Paladin Energy Corporation.

Michael H. Feldewert, Esq. Holland & Hart, LLP P. O. Box 2208 Santa Fe, NM 87504-2208 505/988-4421

## **APPLICANT'S STATEMENT OF CASE**

Applicant in the above-styled cause seeks an order pooling all uncommitted mineral interests in all formations below the base of the Queen formation underlying the S/2 of Section 22, Township 18 South, Range 35 East to form a standard 320-acre gas spacing and proration unit for all formations or pools developed on 320-acre spacing, which presently includes the South Vacuum-McKee Gas Pool. Said unit is to be dedicated to Paladin's proposed South Vacuum 22 Well No. 1 to be drilled at a standard location in SW/4 SE/4 (Unit O) of said Section 22 to test the McKee formation at depth of approximately 14,000 feet. Said area is located approximately 19 miles northwest of Hobbs and 4 miles southwest of Buckeye, New Mexico.

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### **APPLICANT'S PROPOSED EVIDENCE**

WITNESS (Name and Expertise

ESTIMATED TIME

**EXHIBITS** 

Gail Cotton - Landman

Approx. 10 minutes

Approx. 6

# **PROCEDURAL MATTERS**

Paladin is not aware of any procedural matters at this time.

Respectfully submitted,

HOLLAND & HART, LLP

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Michael H. Feldewert P.O. Box 2208 Santa Fe, NM 87504-2208 505/988-4421 Attorneys for Paladin Energy Corporation.