

**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:**

**APPLICATION OF FARLEIGH OIL PROPERTIES  
FOR A COMPLIANCE ORDER AGAINST SWEPI LP  
AND SHELL EXPLORATION AND PRODUCTION  
COMPANY, GUADALUPE COUNTY, NEW MEXICO.**

**Case No. 14,583**

**SECOND AMENDED PRE-HEARING STATEMENT**

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

**APPEARANCES**

**APPLICANT**

Farleigh Oil Properties  
P.O. Box 3215  
Casper, Wyoming 82602

Attention: Tom Swanson

**APPLICANT'S ATTORNEY**

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

**OPPONENT**

SWEPI LP  
Shell Exploration and Production Company

**OPPONENT'S ATTORNEY**

William F. Carr

**OTHER PARTIES**

Oil Conservation Division  
Bayswater Exploration and Production LLC

**OTHER PARTIES ATTORNEY**

Gail MacQuesten  
W. Thomas Kellahin

**STATEMENT OF THE CASE**

**APPLICANT**

Applicant requests the Division to order SWEPI LP and Shell Exploration and Production Company to comply with Division reporting requirements, including, *inter alia*, NMAC 19.15.5.10.B, NMAC 19.15.7.10, and NMAC 19.15.7.16, and Forms C-103, C-105, and C-115, with respect to the following wells:

- (a) Latigo Ranch 2-34  
API No. 30-019-20136  
§34-11N-23E
- (b) Latigo Ranch 3-5  
API No. 30-019-20137  
§5-10N-23E
- (c) Latigo Ranch 3-3  
API No. 30-019-20138  
§3-10N-23E
- (d) Webb 3-23  
API No. 30-019-20135  
§23-11N-23E
- (e) Webb CD 1  
API No. 30-019-20134  
§25-11N-23E

### PROPOSED EVIDENCE

#### APPLICANT

| <u>WITNESSES</u>                               | <u>EST. TIME</u> | <u>EXHIBITS</u> |
|--|------------------|-----------------|
| Tom Swanson<br>(Landman & Exploration Manager) | 40 min.          | Approx. 20      |
| Phillip A. Kriz<br>(Engineer)                  | 15 min.          | Approx. 2       |
| David Bowen<br>(Geologist)                     | 15 min.          | Approx. 5       |
| Shell employee #1                              |                  |                 |
| Shell employee #2                              |                  |                 |

#### OPPONENT

| <u>WITNESSES</u> | <u>EST. TIME</u> | <u>EXHIBITS</u> |
|------------------|------------------|-----------------|
|------------------|------------------|-----------------|

**PROCEDURAL MATTERS**

Respectfully submitted,



James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Farleigh Oil Properties

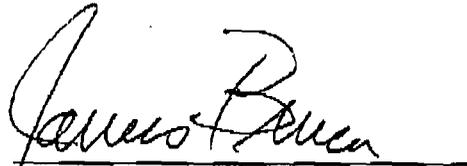
**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 27<sup>th</sup> day of January, 2011 by United States mail:

William F. Carr  
Holland & Hart LLP  
P.O. Box 2208  
Santa Fe, New Mexico 87504

W. Thomas Kellahin  
706 Gonzales Road  
Santa Fe, New Mexico 87501

Gail MacQuesten  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

  
James Bruce