

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 PLATINUM EXPLORATION,  
INC. TO ABOLISH THE SPECIAL RULES AND  
REGULATIONS FOR THE KNOWLES (DEVONIAN)  
POOL, LEA COUNTY, NEW MEXICO.

Case No. 13401

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Platinum Exploration, Inc.  
Suite 500  
550 West Texas  
Midland, Texas 79702

APPLICANT'S ATTORNEY

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

Attention: Gregg Rasmussen  
(432) 687-1664

OPPONENT

Paladin Energy Corp.

OPPONENT'S ATTORNEY

Michael Feldewert

STATEMENT OF THE CASE

APPLICANT

Applicant seeks to abolish the special pool rules for the Knowles  
(Devonian) Pool, which currently provide for 80 acre spacing and  
wells to be within 150 feet of the center of a quarter-quarter  
section, and to institute statewide rules.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

WITNESSES

J. Michael Reeves  
(engineer)

EST. TIME

20 min.

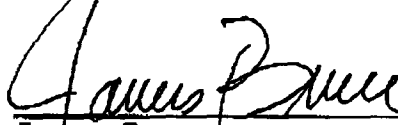
EXHIBITS

Approx. 5

OPPONENTWITNESSESEST. TIMEEXHIBITSPROCEDURAL MATTERS

Paladin Energy Corp. has requested a continuance, although both parties are trying to work out their differences. If the parties cannot come to terms, the case will be continued to allow Paladin Energy Corp. to prepare for hearing.

Respectfully submitted,



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

Attorney for Platinum  
Exploration, Inc.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading was served upon the following counsel of record this 2nd day of January, 2005, by facsimile transmission:

Michael Feldewert  
Holland & Hart LLP  
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James Bruce