

# ABADIE | SCHILL

a professional corporation

LON W. ABADIE\*

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ALSO LICENSED IN

\*CA, NM, UT

°ND, NE, OK

\*NM, CA, LA, D.C.

°OK, CA, CO Pending

**VIA FEDERAL EXPRESS OVERNIGHT DELIVERY**

July 13, 2011

Florene Davidson  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505  
(505) 476-3458

Re: **Application 1 XTO Energy, Inc.**  
**Case No. 14689**  
**XTO's Pre-Hearing Statement**

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Dear Ms. Davidson,

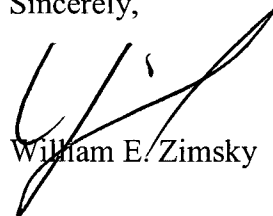
Enclosed please find one original and one copy of a Pre-Hearing Statement filed on behalf of XTO Energy, Inc. in Case No. 14689.

Please cause these documents to be filed with the Oil Conservation Division.

I have also enclosed an extra copy of the Pre-Hearing Statement. Please send me a date stamped copy in the enclosed self-addressed stamped envelope.

Please call me if you have any questions or need more information.

Sincerely,



William E. Zimsky

WEZ: ic  
Enclosures

**STATE OF NEW MEXICO  
ENERGY MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION**

**IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
DIVISION FOR THE PURPOSE OF  
CONSIDERING:**

**Case No. 14689**

**IN THE MATTER OF THE APPLICATION OF XTO ENERGY INC. TO CONTRACT  
THE ANGELS PEAK-GALLUP ASSOCIATED POOL AND CONCOMITANTLY  
EXTEND THE BASIN-MANCOS POOL, SAN JUAN COUNTY, NEW MEXICO.**

**PRE-HEARING STATEMENT**

This pre-Hearing Statement is submitted by Abadie & Schill, PC on behalf of  
as required by Oil Conservation Rule 19.15.14.1204 B NMAC.

**APPEARANCES OF PARTIES**

**APPLICANT**

XTO Energy Inc.

**ATTORNEY**

William E. Zimsky  
Abadie & Schill, PC  
1099 Main Avenue, Suite 315  
Durango, CO 81301  
Telephone: (970) 385-4401  
wez@oilgaslaw.net

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**STATEMENT OF CASE**

This application involves the development of oil and gas from the Angels Peak-Gallup Associated Pool located in Township 27 North, Range 10 West, Sections 19, 20 21 and 22, N.M.P.M., San Juan County, New Mexico. XTO seeks an order contracting the Angels Peak-Gallup Associated Pool by the deletion of all of Sections 19, 20 21 and 22, Township 27 North, Range 10 West, N.M.P.M., and the concomitant extension of the Basin-Mancos Pool.

## **PROPOSED EVIDENCE**

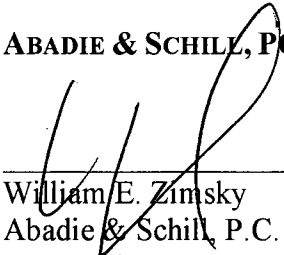
<b>WITNESSES</b> (Name and expertise)	<b>EST. TIME</b>	<b>EXHIBITS</b>
Ryan O'Kelley Senior Landman	Approx. 10 min.	Approx. 3
Steven Cervantes Reservoir Engineer	Approx. 25 min.	Approx. 20
Testimony of Steve Hayden in Case No. 14133 Former OCD Geologist	Not applicable	1 (copy of testimony)

## **PROCEDURAL MATTERS**

XTO has none at this time

Dated this 13<sup>th</sup> day of July, 2011.

**ABADIE & SCHILL, PC**



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**ATTORNEYS FOR XTO ENERGY, INC.**