

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

RECEIVED 000
2012 JUN 18 A 10:43

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

**APPLICATION OF MACK ENERGY
CORPORATION FOR COMPULSORY
POOLING, LEA COUNTY, NEW MEXICO.**

Case No. 14,871

**APPLICATION OF MACK ENERGY
CORPORATION FOR COMPULSORY
POOLING, LEA COUNTY, NEW MEXICO.**

Case No. 14,872

**APPLICATION OF MACK ENERGY
CORPORATION FOR COMPULSORY
POOLING, LEA COUNTY, NEW MEXICO.**

Case No. 14,873

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Mack Energy Corporation
P.O. Box 960
Artesia, New Mexico 88211

Attention: Staci Sanders
(575) 748-1288

APPLICANT'S ATTORNEY

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

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Case 14871: Mack Energy Corporation seeks an order pooling all mineral interests from the surface to the base of the San Andres formation underlying the SE $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 8, Township 17 South, Range 32 East, N.M.P.M., to form a standard 40-acre oil spacing and proration unit for any and all formations or pools developed on 40-acre spacing within that vertical extent. The unit will be dedicated to the Pintail Fed. Well No. 2, to be drilled at an orthodox location. Also to be considered will be the cost of re-completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in re-completing the well.

Case 14872: Mack Energy Corporation seeks an order pooling all mineral interests from the surface to the base of the San Andres formation underlying the SW $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 8, Township 17 South, Range 32 East, N.M.P.M., to form a standard 40-acre oil spacing and proration unit for any and all formations or pools developed on 40-acre spacing within that vertical extent. The unit will be dedicated to the Pintail Fed. Well No. 3, to be drilled at an orthodox location. Also to be considered will be the cost of re-completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in re-completing the well.

Case 14873: Mack Energy Corporation seeks an order pooling all mineral interests from the surface to the base of the San Andres formation underlying the NW $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 8, Township 17 South, Range 32 East, N.M.P.M., to form a standard 40-acre oil spacing and proration unit for any and all formations or pools developed on 40-acre spacing within that vertical extent. The unit will be dedicated to the Pintail Fed. Well No. 4, to be drilled at an orthodox location. Also to be considered will be the cost of re-completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in re-completing the well.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

WITNESSES

Staci D. Sanders
(landman)

EST. TIME

25 min.

EXHIBITS

Approx. 8

IF THE CASES ARE UNOPPOSED THEY WILL BE SUBMITTED BY AFFIDAVIT.

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

Applicant requests that the cases be consolidated for hearing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James Bruce", is written over a horizontal line.

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

Attorney for Mack Energy Corporation