

**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:**

CASE NO. 13457

**APPLICATION OF BP AMERICA
PRODUCTION COMPANY
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP as required by
the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

BP America Production Company
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ATTORNEY

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OPPONENT

None.

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None.

STATEMENT OF CASE

Applicant in the above-styled cause seeks an order pooling the record title owner of State Lease B-1431-4 covering the SE/4 SW/4 of Section 28, Township 17 South, Range 34 East, NMPM, Lea County, New Mexico, from the base of the Abo formation

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50/1/4 - 155m

to the base of the Morrow formation to form a standard S/2 320-acre gas spacing and proration unit for all formations or pools spaced on 320 acres within this vertical extent, which presently includes but are not necessarily limited to the Undesignated Vacuum Morrow Gas Pool. This spacing and proration unit will be dedicated to the existing Sunflower 28 State Well No. 1 located 1460 feet from the South line and 660 feet from the East line (Unit I) of said Section 28. Applicant has been unable to locate the record title owner of State Lease B-1431-4.

PROPOSED EVIDENCE

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

None: This case will be presented pursuant to the alternative procedure authorized by Rule 1207.A(1)(b)

PROCEDURAL MATTERS

BP America Production Company is not aware of any procedural matters at this time.

Respectfully Submitted,

Holland & Hart LLP



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