

**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 EDGE PETROLEUM  
EXPLORATION COMPANY FOR A NON-  
STANDARD GAS SPACING AND PRORATION  
UNIT, LEA COUNTY, NEW MEXICO.**

**Case No. 13,506**

**PRE-HEARING STATEMENT**

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

**APPEARANCES**

**APPLICANT**

Edge Petroleum Exploration Company  
Suite 2000  
1301 Travis  
Houston, Texas 77002

Attention: Jeff A. Sikora  
(713) 427-8843

**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**

Applicant seeks an order approving a non-standard 320-acre gas spacing and proration unit in the Morrow formation (Lusk-Morrow Gas Pool) comprised of the S/2 of Section 28, Township 19 South, Range 32 East, NMPM. The unit is to be dedicated to applicant's proposed South Lusk 28 "H" Fed. Com. Well No. 1, to be drilled at an orthodox location in the SW/4SW/4 of Section 28.

**OPPONENT**

*JB 7/11/05*

**PROPOSED EVIDENCE****APPLICANT****WITNESSES**Jeff A. Sikora  
(landman)**EST. TIME**

10 min.

**EXHIBITS**

Approx. 2

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(geologist)

20 min.

Approx. 4

**OPPONENT****WITNESSES****EST. TIME****EXHIBITS****PROCEDURAL MATTERS**

Applicant requests that this case be consolidated for hearing with Case No. 13484, because the same lands are involved.

Respectfully submitted,



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James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043Attorney for Edge Petroleum Exploration  
Company

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

IN THE MATTER OF THE APPLICATION OF EDGE  
PETROLEUM EXPLORATION COMPANY FOR A  
NON-STANDARD GAS SPACING AND PRORATION UNIT,  
LEA COUNTY, NEW MEXICO

CASE NO. 13506

2005 JUL 13 PM 2:24

**ENTRY OF APPEARANCE**

Comes now CIMAREX ENERGY COMPANY, by and through its undersigned attorneys, Miller Stratvert P.A., (J. Scott Hall) and hereby enters its appearance in the above cause.

MILLER STRATVERT P.A.

By:

J. Scott Hall  
J. Scott Hall  
Attorneys for Cimarex Energy Company  
Post Office Box 1986  
Santa Fe, New Mexico 87504-1986  
(505) 989-9614

**Certificate of Service**

I hereby certify that a true and correct copy of the foregoing was faxed to counsel of record on the 13th day of July, 2005, as follows:

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J. Scott Hall  
J. Scott Hall