

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

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

CASE NO. 13541

APPLICATION OF BASS ENTERPRISES  
PRODUCTION COMPANY FOR COMPULSORY  
POOLING, EDDY 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

Bass Enterprises Production Co.  
Attn: Ryan P. Dobbs  
201 Main Street, Suite 2900  
Ft. Worth, Texas 76102  
(817) 390-8671

ATTORNEY

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STATEMENT OF CASE

APPLICANT

Applicant in the above-styled cause seeks an order pooling all mineral interests from  
the surface to the base of the Morrow formation in the N/2 of Section 32, Township 21  
South, Range 28 East, NMPM, Eddy County, New Mexico, in order to form a standard 320-  
acre gas spacing and proration unit for all formations or pools spaced on 320 acres within this  
vertical extent, which presently include but are not necessarily limited to the Undesignated

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East Carlsbad-Wolfcamp, Undesignated East Carlsbad-Strawn, and the Undesignated East Carlsbad-Morrow Gas Pools. This spacing and proration unit is to be dedicated to the Big Eddy Unit Well No. 149 to be drilled at a standard location 1980 feet from the North line and 660 feet from the East line of Section 32 in order to test the Morrow formation. Also to be considered will the cost of drilling and completion of said well and the allocation of the cost thereof, the actual operating costs and charges for supervision, designation of applicant as operator of the well and a charge for risk involved in drilling said well. Said area is located approximately 5 miles east of Carlsbad, New Mexico.

**PROPOSED EVIDENCE**

**APPLICANT**

**WITNESSES**  
(Name and Expertise)

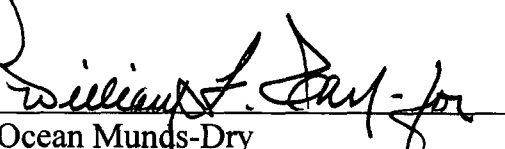
**ESTIMATED TIME**

**EXHIBITS**

**BY AFFIDAVIT**

**PROCEDURAL MATTERS**

Bass Enterprises Production Company has none at this time.

  
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Ocean Munds-Dry  
Attorney for Bass Enterprises Production  
Company