

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:

APPLICATION TO AMEND ORDER NO. R-12984
TO REMOVE CERTAIN ACREAGE FROM THE
BASIN-MANCOS GAS POOL (97232), ETC.,
MCKINLEY, RIO ARRIBA, SAN JUAN, AND SANDOVAL
COUNTIES, NEW MEXICO.

Case No. 15191

ENTRY OF APPEARANCE AND PRE-HEARING STATEMENT

James Bruce enters his appearance in this case on behalf of Enervest Operating, LLC.

This pre-hearing statement is submitted by Enervest Operating, LLC as required by the
Oil Conservation Division.

APPEARANCES

APPLICANT

ConocoPhillips Company, *et al.*

Logos Resources, LLC

OTHER PARTIES

Benson-Montin-Greer Drilling Corp.

Oil Conservation Division

Chuza Oil Co.

Hart Oil & Gas, Inc.

IPANM

APPLICANT'S ATTORNEY

Michael Feldewert
Gabrielle Gerholt

J. Scott Hall

OTHER PARTIES' ATTORNEYS

Gene Gallegos
Michael Condon

Gabe Wade

Ernest L. Padilla

Kirk Kennedy

Karin V. Foster

Enervest Operating LLC
Suite 800
1001 Fannin Street
Houston, Texas 77002

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

Attention: Christopher Jeffus

STATEMENT OF THE CASE

APPLICANT

OTHER PARTIES

Enervest Operating, LLC approves of the application, but desires to include the following additional acreage in the application:

26N-3W – Sections 5, 6, 7, 8, 17, 18, 19, 20
26N-4W – Sections 1 through 24
26N-5W – Sections 1 through 24
26N-6W – Sections 1, 12, 13, 24
30N-12W – Sections 5, 6, 7, 8, 17, 18, 19, 20, 29, 30, 31, 32
31N-12W – Sections 5, 6, 7, 8, 17, 18, 19, 20, 29, 30, 31, 32
32N-12W – Sections 7, 8, 17, 18, 19, 20, 29, 30, 31, 32
30N-13W – Sections 1, 2, 3, 4, 9, 10, 11, 12
31N-13W – Sections 25, 26, 27, 28, 33, 34, 35, 36

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OTHER PARTIES

WITNESSES

EST. TIME

EXHIBITS

Christopher Jeffus
(landman)

10 minutes

Approx. 2


Callie Zazzi
(engineer)

10 minutes

Approx. 2

PROCEDURAL MATTERS

Respectfully submitted,

A handwritten signature in dark 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 Enervest Operating, LLC

cc: Counsel of record via e-mail