

PADILLA LAW FIRM, P.A.

STREET ADDRESS
1512 S. ST. FRANCIS DRIVE
SANTA FE, NM 87505

MAILING ADDRESS
P.O. BOX 2523

SANTA FE, NEW MEXICO 87504-2523

EMAIL ADDRESS

padillalaw@qwestoffice.net

TELEPHONE
505-988-7577

FACSIMILE
505-988-7592
RECEIVED OGD
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August 19, 2014

VIA ELECTRONIC MAIL ONLY

florene.davidson@state.nm.us

Jami Bailey, Division Director
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Oil Conservation Division Case No. 15191

Dear Ms. Bailey:

Yesterday, a copy of the attached Pre-Hearing Statement was provided to us by Gabrielle Gerholt of Holland and Hart. The Pre-Hearing Statement represents that I am attorney for Chuza Oil Company in the above referenced proceeding. Although, I am counsel for Chuza Oil Company in other matters, I have not been authorized nor does Chuza Oil Company wish to participate in this matter.

Accordingly, please delete my name as counsel for Chuza Oil Company in case number 15191.

Please let me know if you have any questions.

Very truly yours,



ERNEST L. PADILLA

ELP:jbg

Enclosure as stated

cc: James Bruce
Michael Feldewert
Gabrielle Gerholt
Michael Condon
Gabe Wade
Karin V. Foster
Gene Gallegos

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 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

Chuzá 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,



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