

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

2014 OCT 23 A 11: 38

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

APPLICATION OF SOVEREIGN EAGLE, LLC
FOR COMPULSORY POOLING, ROOSEVELT
COUNTY, NEW MEXICO.

Case No. 15,224

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Sovereign Eagle, LLC

APPLICANT'S ATTORNEY

J. Scott Hall

OPPONENT

Yates Brothers
c/o Yates Holdings LLC
P.O. Box 1394
Artesia, New Mexico 88211

OPPONENT'S ATTORNEY

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

Attention: Jim Ball
(575) 736-8575

STATEMENT OF THE CASE

APPLICANT

Applicant seeks to force pool uncommitted interests in the Stoltenberg Well No. 1, located in the N/2 of Section 26, Township 2 South, Range 29 East, N.M.P.M.

OPPONENT

Yates Brothers opposes the application because applicant has not followed established Division procedures which are necessary to show good faith negotiations. The application should be dismissed.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

Jim Ball
(landman)

15 min.

Approx. 4

PROCEDURAL MATTERS

Yates Brothers requests that the case be continued for two weeks because of witness unavailability.

Respectfully submitted,




James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Yates Brothers

CERTIFICATE OF SERVICE

The foregoing pleading was served upon the following counsel of record this 23rd of October, 2014 via e-mail:

J. Scott Hall
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James Bruce