

**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 BP AMERICA PRODUCTION
COMPANY FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

Case No. 13,805

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

BP America Production Company
P.O. Box 3092
Houston, Texas 77253

Attention: J.P. Adams

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 pooling all mineral interests from the top of the Cisco formation to the base of the Morrow formation underlying Lots 3, 4, S/2NW/4, and SW/4 (the W/2) of Section 3, Township 18 South, Range 34 East, NMPM, to form a standard 321.09-acre gas spacing and proration unit for all pools or formations developed on 320-acre spacing within that vertical extent, including the Vacuum-Morrow Gas Pool. The unit is to be dedicated to the South Sunflower "3" State Com. Well No. 1, drilled at an orthodox gas well location in Lot 4 of Section 3. Also to be considered will be the designation of applicant as operator of the well.

OPPONENT

PROPOSED EVIDENCE**APPLICANT****WITNESSES****EST. TIME****EXHIBITS**

This application will be submitted by affidavit.

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

Respectfully submitted,

A handwritten signature in black 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 BP America Production
Company