

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

**RECEIVED
2007 JUN 14 PM 1 12**

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

**APPLICATION OF HOLCOMB OIL & GAS, INC.
FOR AN UNORTHODOX WELL LOCATION,
SAN JUAN COUNTY, NEW MEXICO**

CASE 13918

PRE-HEARING STATEMENT

**XTO Energy Inc. submits its pre-hearing statement as required by the New Mexico
Oil Conservation Division.**

APPEARENCES OF THE PARTIES

APPLICANT

Holcomb Oil & Gas, Inc.

ATTORNEY

Earnest L. Padilla, Esq.

OPPOSITION

**XTO Energy, Inc.
810 Houston Street
Houston, TX 76102
Attn: Chris Spencer
(817) 885-1954**

ATTORNEY

**Thomas Kellahin, Esq.
706 Gonzales Road
Santa Fe, NM 87501
Fax 505-982-2047
Ph 505-982-4285**

STATEMENT OF THE CASE

OPPONENT:

XTO Energy, Inc. is opposed to Holcomb's request to drill a Basin-Fruitland coal-gas well 170 feet from the boundary of Holcomb's spacing unit. This location encroaches upon the E/2 of Section 27, T29N, R11W where XTO has an interest.

Holcomb has based its request upon surface problems.

This extreme unorthodox well location is not necessary because Holcomb has available to it other surface locations.

XTO seeks an order of the Division denying this location and denying Holcomb's APD.

PROPOSED EVIDENCE

OPPONENT

WITNESSES	EST. TIME	EST. EXHIBITS
Paul Lehrman, Land Surface Coordinator	30-45 min	
John Klutsch, Geologist	20-min	
Mandi Moncrief, PE	20 min	

PROCEDURAL MATTERS

None anticipated

KELLAHIN & KELLAHIN



W. Thomas Kellahin
706 Gonzales Road
Santa Fe, New Mexico 87501
Phone 505-982-4285
Fax 505-982-2047
E-mail: tkellahin@comcast.net.

CERTIFICATE OF SERVICE

I certify that on June 14, 2007, I served a copy of the foregoing documents by:

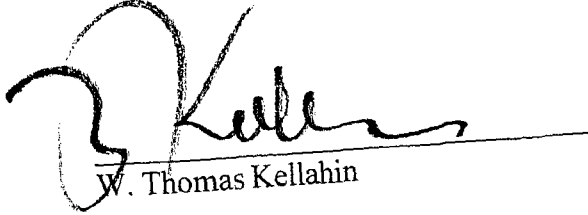
☐ US Mail, postage prepaid

☐ Hand Delivery

☒ Facsimile

to the following:

Earnest L. Padilla, Esq.



W. Thomas Kellahin