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### 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 PURPOSES OF CONSIDERING:

CASE NO. 13948

## APPLICATION OF PARALLEL PETROLEUM CORPORATION FOR COMPULSORY POOLING, CHAVES COUNTY, NEW MEXICO.

#### PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

### APPEARANCES OF PARTIES

### APPLICANT

#### ATTORNEY

Mr. Aaron Myers Parallel Petroleum Corp. Post Office Box 10587 Midland, Texas 79702 (432) 688-3699 Ocean Munds-Dry Holland & Hart, LLP P.O. Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421

### STATEMENT OF CASE

#### APPLICANT

Applicant in the above-styled cause seeks an order pooling all mineral interests from the surface to the base of the Wolfcamp formation in the following described spacing and proration units located in the S/2 of Section 20, Township 15 South, Range 25 East, N.M.P.M., Chaves County, New Mexico: the S/2 for all formations and/or pools developed on 320-acre spacing. Said unit is to be dedicated to its Bubbling Over 1525-20 Fed Com Well No. 1 to be drilled at a surface location 1880 feet from the South line and 190 feet from the West line of Section 20, Township 15 South, Range 25 East, NMPM, Chaves County, New Mexico: New Mexico to an approximate depth of 5500 feet to test any and all formations from the surface to the base of the Wolfcamp formation. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision.

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designation of Parallel Petroleum Corporation as operator of the well and a charge for risk involved in drilling said well. Said area is located S miles north of Artesia, New Mexico.

### PROPOSED EVIDENCE

# APPLICANT

WITNESSES

ESTIMATED TIME

EXHIBITS

By Affidavit

Approx. 15 minutes

Approx, 10

# PROCEDURAL MATTERS

Parallel Petroleum Corporation has none at this time.

Ocean Munds-Dry Attorney for Parallel Petroleum Corp.