

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 LEEDE OPERATING COMPANY,  
L.L.C. FOR COMPULSORY POOLING, LEA  
COUNTY, NEW MEXICO.

Case No. 13,171

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Leede Operating Company, L.L.C.  
2100 Plaza Tower One  
6400 South Fiddler's Greene Circle  
Englewood, Colorado 80111

APPLICANT'S ATTORNEY

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

Attention: Rusty Brusenhan

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order pooling all mineral interests from the surface to the base of the Abo formation underlying the NW¼SE¼ of Section 7, Township 19 South, Range 39 East, NMPM, to form a standard 40-acre oil spacing and proration unit for any formations and/or pools developed on 40-acre spacing within that vertical extent, including the Undesignated Foster-San Andres Pool and Undesignated Nadine Drinkard-Abo Pool. The unit is to be dedicated to the Schubert "7" Well No. 1, to be drilled at an orthodox oil well location in the NW¼SE¼ of Section 7. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of Sahara Operating Company as operator of the well, and a charge for the risk involved in drilling and completing the well.

OPPONENT

KYJT  
12/15/03

**PROPOSED EVIDENCE****APPLICANT**

**WITNESSES**  
Rusty Brusenhan  
(landman)

**EST. TIME**  
15 min.

**EXHIBITS**  
Approx. 4

**OPPONENT**

**WITNESSES**

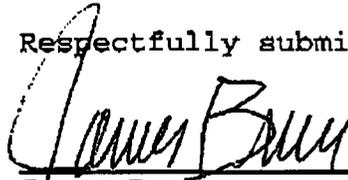
**EST. TIME**

**EXHIBITS**

**PROCEDURAL MATTERS**

-None-

Respectfully submitted,



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

Attorney for Leede Operating Company,  
L.L.C.