

**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 LYNX PETROLEUM  
CONSULTANTS INC. FOR AN ORDER  
AUTHORIZING THE DRILLING  
OF A WELL IN THE POTASH AREA,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 14520**

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**PRE- HEARING STATEMENT**

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

**APPEARANCES OF PARTIES**

**APPLICANT**

Larry R. Scott  
Lynx Petroleum Consultants Inc.  
PO Box 1708  
Hobbs, NM 88241  
(575) 392-6950

**ATTORNEY**

Ocean Munds-Dry  
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Post Office Box 2208  
Santa Fe, New Mexico 87504  
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**STATEMENT OF CASE**

**APPLICANT**

Applicant seeks an order approving the drilling of its proposed Eddy "BD" State Well No. 3 within the Potash Area at a location 1980 feet from the North line and 1980 feet from the East line (Unit G) of Section 32, Township 20 South, Range 30 East, NMPM, Eddy County, New Mexico. This well will be drilled to an approximate depth of 11,500 feet to test all formations from the surface to the Strawn formation, Golden Lane Strawn Pool and will be at a standard location in all formations. Said location is within the Potash Area and located approximately 14 miles Northeast of Carlsbad, New Mexico.

## **PROPOSED EVIDENCE**

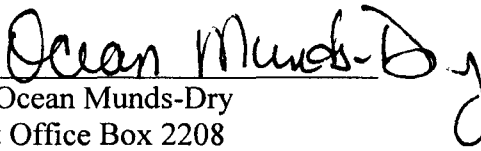
<u>WITNESSES</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Larry Scott, Practical Oilman and Petroleum Engineer	30 minutes	5

## **PROCEDURAL MATTERS**

Lynx Petroleum Consultants Inc. has none at this time.

Respectfully submitted,

HOLLAND & HART LLP

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