#### **BEFORE THE**

#### OIL CONSERVATION DIVISION

#### NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS

APPLICATION OF GILLESPIE-CROW, INC. FOR UNIT EXPANSION, STATUTORY UNITIZATION, AND QUALIFICATION OF THE EXPANDED UNIT AREA FOR THE RECOVERED OIL TAX RATE AND CERTIFICATION OF A POSITIVE PRODUCTION RESPONSE PURSUANT TO THE "NEW MEXICO ENHANCED OIL RECOVERY ACT," LEA COUNTY, NEW MEXICO.

CASE NO. 11724

# PRE-HEARING STATEMENT

MAY 9 1997
Oil Conservation Division

#### **APPEARANCES**

## **APPLICANT'S ATTORNEY**

James Bruce, Esq. P.O. Box 1056 Santa Fe, New Mexico 87504-1056 Attorneys for Gillespie-Crow, Inc.

## **APPLICANT**

Gillespie-Crow, Inc.

## **OPPONENT'S ATTORNEY**

William F. Carr, Esq. Campbell, Carr, Berge & Sheridan P.O. Box 2208 Santa Fe, NM 87504

## **OPPONENT**

Yates Petroleum Corp. Hanley Petroleum Corp.

#### OTHER PARTY'S ATTORNEY

J. Scott Hall, Esq. Miller, Stratvert & Torgerson, P.A. Post Office Box 1986 Santa Fe, New Mexico 87504-1986 (505) 989-9614

# OTHER PARTY

Enserch Exploration, Inc.

## STATEMENT OF THE CASE

## **APPLICANT**

Expansion of West Lovington Strawn Unit pursuant to the statutory Unitization Act and qualification of expanded acreage for recovered oil tax rate.

## **OPPONENT**

#### PROPOSED EVIDENCE

Enserch Exploration, Inc. will present evidence in support of and in conjunction with the Unit Operator's application. Proponents will present four witnesses. It is estimated the direct case will take approximately two hours.

#### PROCEDURAL MATTERS

Disposition of the Enserch Motion to Strike, the Hanley/Yates Motion to Dismiss and the Gillespie-Crow Motion to Restrict Production.

MILLER, STRATVERT & TORGERSON, P.A.

By

J. Scott Hall

Attorneys for Enserch Exploration, Inc.

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## **Certificate of Mailing**

I hereby certify that a true and correct copy of the foregoing was mailed to counsel of record on the day of May, 1997, as follows:

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