

**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:

12 1994

CASE NO. 11,070

**APPLICATION OF SANTA FE ENERGY
OPERATING PARTNERS, L.P. FOR
COMPULSORY POOLING, AN UNORTHODOX
GAS WELL LOCATION, AND A NON-
STANDARD GAS PRORATION UNIT,
EDDY COUNTY, NEW MEXICO.**

PRE-HEARING STATEMENT

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

APPEARANCE OF PARTIES

APPLICANT

Santa Fe Energy Operating
Partners, L.P.
Suite 1330
550 West Texas
Midland, Texas 79701
(915) 686-6631
Attn: C. Smith

ATTORNEY

James Bruce
Hinkle, Cox, Eaton, Coffield
& Hensley
Post Office Box 2068
Santa Fe, New Mexico 87504-2068
(505) 982-4554

OTHER PARTY

ATTORNEY

STATEMENT OF CASE

APPLICANT

Applicant seeks to force pool Lots 1-4 and the E $\frac{1}{2}$ W $\frac{1}{2}$ of Section 19 - 23 South - 29 East (313.66 acres) for a well to test the Atoka formation. One interest owner has not yet committed its interest to the well, and needs to be pooled. The unorthodox location is based on geological reasons.

OTHER PARTY

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
Curtis Smith (Landman)	10 minutes	(a) Land Plat (b) Correspondence (c) AFE (d) Affidavit of Notice
Louis Goldstein (Geologist)	15 minutes	(a) Isopachs (b) Production Map

OTHER PARTY

WITNESSES	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD
& HENSLEY

A handwritten signature in cursive script, appearing to read "James Bruce", is written over a horizontal line.

James Bruce
Post Office Box 2068
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Attorneys for Applicant