

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:

16 1994

APPLICATION OF MOBIL EXPLORATION
AND PRODUCING U.S. INC. FOR A
HIGH ANGLE/HORIZONTAL DIRECTIONAL
DRILLING PROJECT, ETC., LEA
COUNTY, NEW MEXICO.

CASE NO. 11,071

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Exxon
Corporation as required by the Oil Conservation Division.

APPEARANCE OF PARTIES:

Applicant:

Mobil Exploration and
Producing U.S. Inc.

Attorney:

Nancy King/Galen Buller

Other Party:

Exxon Corporation
Post Office Box 1600
Midland, Texas 75701
Attn: William T. Duncan
(915) 688-6174

Attorney:

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

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STATEMENT OF CASE:

APPLICANT:

OPPOSITION:

Exxon Corporation is an offset operator to Mobil's proposed project, and thus is interested in the case.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES

ESTIMATED TIME

EXHIBITS

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OPPOSITION:

WITNESSES

ESTIMATED TIME

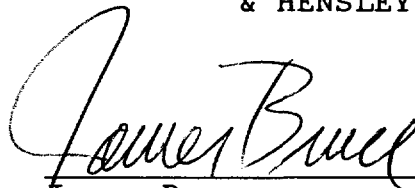
EXHIBITS

At this time Exxon Corporation does not plan to present witnesses.

PROCEDURAL MATTERS

HINKLE, COX, EATON, COFFIELD
& HENSLEY

By: _____



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Post Office Box 2068
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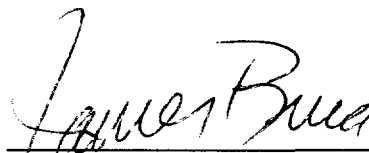
Attorneys for Exxon Corporation

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing **Pre-Hearing Statement** was hand delivered this 16th day of August, 1994 to:

Nancy King
Montgomery & Andrews
325 Paseo de Peralta
Santa Fe, New Mexico 87501

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

James Bruce

exnphr.stt

MONTGOMERY & ANDREWS

OF COUNSEL
William R. Federici

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July 26, 1994

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COUNSEL
Marvin E. Pollock

Mr. Michael H. Stogner
Chief Hearing Examiner
Oil Conservation Division
State Land Office Building
310 Old Santa Fe Trail, 2nd Floor
Santa Fe, New Mexico 87501

11071

Re: State M #16, #17 and State O #3
Section 34 & 33, T17S, R35E
Application of Mobil Exploration & Producing U.S.
Inc. for a High Angle/Horizontal Direction Drilling
Pilot Project, Special Operating Rules Therefor,
including a Non-Standard Oil Spacing & Proration
Unit and a Special Project Allowable and Testing
Period, Lea County, New Mexico

Dear Mr. Stogner:

On behalf of Mobil Exploration & Producing U.S. Inc. as agent for Mobil Producing TX & NM Inc., please find enclosed our Application for a High Angle/Horizontal Direction Drilling Pilot Project as referenced above, which we request be set for hearing on the next available Examiner's docket now scheduled for August 18, 1994.

By copy of this letter and application, sent certified mail, we are notifying all interested parties adjoining the subject non-standard spacing and proration unit of their right to appear at the hearing and participate in this case, including the right to present evidence either in support of or in opposition to the application and that failure to appear at the hearing may preclude them from any involvement in this case at a later date.

Pursuant to the Division's Memorandum 2-90, all parties are hereby informed that if they appear in this case, then they are requested to file a Pre-Hearing Statement with the Division not