# 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:

contact person

MATA .

APPLICATION OF ANSON GAS CORPORATION FOR COMPULSORY POOLING AND AN UNORTHODOX OIL WELL LOCATION, LEA COUNTY, NEW MEXICO.

No. 11129

### **PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Campbell, Carr, Berge & Sheridan, P.A., as required by the Oil Conservation Division.

## **APPEARANCES OF PARTIES**

| APPLICANT                               | ATTORNEY                               |  |  |
|---|--|--|--|
| AnSon Gas Corporation                   | William F. Carr, Esq.                  |  |  |
| c/o Charles E. Lundeen                  | Campbell, Carr, Berge & Sheridan, P.A. |  |  |
| 3814 North Santa Fe                     | Post Office Box 2208                   |  |  |
| Oklahoma City, OK                       | Santa Fe, New Mexico 87504             |  |  |
| (405) 528-0505                          | (505) 988-4421                         |  |  |
| name, address, phone and contact person |  |  |  |
| OTHER PARTY                             | ATTORNEY                               |  |  |
|   |  |  |  |
|   |  |  |  |
|   |  |  |  |
|   |  |  |  |
| name, address, phone and                |  |  |  |

Pre-hearing Statement NMOCD Case No. 11129 Page 2

#### STATEMENT OF CASE

### **APPLICANT**

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

AnSon Gas Corporation, applicant in the above-styled cause, seeks an order pooling all mineral interests from the surface to the base of the Atoka formation underlying the N/2 SE/4 of Section 15, Township 17 South, Range 37 East, forming a standard 80-acre oil spacing and proration unit for any and all formations and/or pools developed on 80-acre spacing within said vertical extent, which presently includes both the Undesignated Humble City-Atoka Pool and the Undesignated Humble City-Strawn Pool. Said unit is to be dedicated to a well to be drilled at an unorthodox oil well location 2310 feet from the South line and 410 feet from the East line (Unit I) of Section 15. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of applicant as the operator of the well and a charge for the risk involved in drilling and completing said well.

#### OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

# Pre-hearing Statement NMOCD Case No. 11129 Page 3

## PROPOSED EVIDENCE

# <u>APPLICANT</u>

| WITNESSES (Name and expertise) | EST. TIME | EXHIBITS        |
|--------------------------------|-----------|-----------------|
| Charles E. Lundeen, Landman    | 15 Min.   | Approximately 8 |
| Hal E. Hawthorne, Geologist    | 10 Min.   | Approximately 4 |

# OTHER PARTY

| WITNESSES            | EST. TIME | <b>EXHIBITS</b> |
|----------------------|-----------|-----------------|
| (Name and expertise) |           |                 |

## PROCEDURAL MATTERS

(Please identify any procedural matters which need to be resolved prior to hearing)

Signature

#### STATE OF NEW MEXICO



#### ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

#### OIL CONSERVATION DIVISION

December 19, 1994

BRUCE KING GOVERNOR 2040 S. PACHECO SANTA FE, NEW MEXICO 87505 (505) 827-7131

Campbell, Carr, Berge & Sheridan, P. A. Attn: William F. Carr P. O. Box 2208
Santa Fe, New Mexico 87504-2208

Re:

Case No. 11,129, Application of AnSon Gas Corporation for Compulsory Pooling and an Unorthodox Oil Well Location, Lea County,

New Mexico.

Dear Mr. Carr:

In preparing an order for the subject case it became apparent to me that "somewhere down the line a few wires got crossed" and in the confusion this case was inadvertently dismissed at the December 15, 1994 hearing.

Evidently, action was taken on your letter dated December 9, 1994 to dismiss this matter at the request of Amoco and your letter dated December 12, 1994, on behalf of the applicant to continue this matter to the January 5, 1995 docket was overlooked by me.

I have therefore caused this case to be reopened on the January 19, 1995 docket at which time an order can be issued.

I sincerely apologize for any inconvenience this delay may cause, thank you for your patience and understanding.

Should you have any further questions or comments concerning this matter, please contact me at (505) 827-8185. Thank you.

Sincerely,

Michael E. Stogner

Chief Hearing Officer/Engineer

cc: Oil Conservation Division - Hobbs

Case File 11,129 -