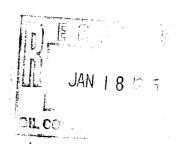
# STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:



APPLICATION OF ORYX ENERGY COMPANY FOR AN UNORTHODOX INFILL GAS WELL LOCATION, EDDY COUNTY, NEW MEXICO.

No. 11189

#### 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	
ORYX Energy Company	W. Thomas Kellahin, Esq. Kellahin & Kellahin Post Office Box 2265 Santa Fe, New Mexico 87504 (505) 982-4285	
name, address, phone and contact person		
OTHER PARTY	ATTORNEY	
Chevron U.S.A. Inc. c/o Al Bohling Post Office Box 1150	William F. Carr, Esq. Campbell, Carr, Berge & Sheridan, P.A. Post Office Box 2208	

Santa Fe, New Mexico 87504

(505) 988-4421

name, address, phone and contact person

Midland, TX 79702

(713) 871-3663

Pre-hearing Statement NMOCD Case No. 11189 Page 2

#### STATEMENT OF CASE

# **APPLICANT**

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

#### **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.)

Chevron will appear and request that the proposed ORYX well be penalized due to its unorthodox location and request that the penalty for the spacing unit be increased if ORYX produces more than a well on this spacing unit.

Pre-hearing Statement NMOCD Case No. 11189 Page 3

#### PROPOSED EVIDENCE

# **APPLICANT**

WITNESSES (Name and expertise)

EST. TIME

**EXHIBITS** 

# **OTHER PARTY**

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
David Rittersbacher, Geologist	15 Min.	Approximately 4
Brian Huzzy, Petroleum Engineer	10 Min.	Approximately 3

# PROCEDURAL MATTERS

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

Signature

Pre-hearing Statement NMOCD Case No. 11189 Page 4

# **CERTIFICATE OF SERVICE**

I hereby certify that on this day of January, 1995, I have caused to be faxed and hand-delivered a copy of our Pre-Hearing Statement in the above-captioned case to the following named counsel:

W. Thomas Kellahin, Esq. Kellahin & Kellahin 117 North Guadalupe Street Santa Fe, New Mexico 87501

William F. Carr