

**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:

CASE NO. 11194

APPLICATION OF GILLESPIE-CROW, INC. FOR APPROVAL  
OF A PRESSURE MAINTENANCE PROJECT AND QUALIFICATION  
FOR THE RECOVERED OIL TAX RATE, LEA COUNTY, NEW  
MEXICO.

CASE NO. 11195

APPLICATION OF GILLESPIE-CROW, INC. FOR  
STATUTORY UNITIZATION, LEA 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**

Gillespie-Crow, Inc.  
Post Office Box 8  
Midland, Texas 79702  
(915) 683-1765

**ATTORNEY**

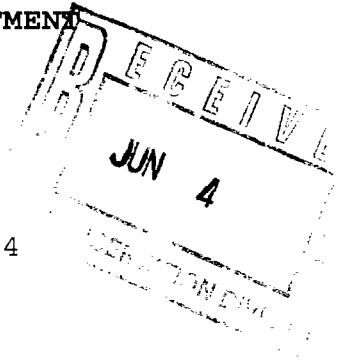
James Bruce, Esq.  
Hinkle, Cox, Eaton, Coffield  
& Coffield, P.L.L.C., Ltd. Co.  
Post Office Box 2068  
Santa Fe, New Mexico 87504  
(505) 982-4554

**OPPONENT**

Snyder Ranches, Inc.  
Larry Squires  
Post Office Box 2158  
Hobbs, New Mexico 88240  
(915) 682-5241

**ATTORNEY**

W. Thomas Kellahin, Esq.  
Kellahin and Kellahin  
Post Office Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285



**STATEMENT OF CASE**

Applicant requests statutory unitization of the West Lovington Strawn Pool in order to institute a gas injection pressure maintenance project. The project will increase recovery of reserves in the Pool.

The Unit Agreement and Unit Operating Agreement are fair and reasonable, and the participation formula allocates hydrocarbons to each tract on a fair and equitable basis.

**PROPOSED EVIDENCE**

APPLICANT

	<u>EST. TIME</u>	<u>EXHIBITS</u>
William Crow (Geologist)	30 minutes	11
Kevin Widner (Engineer)	30 minutes	Approx. 5
Paul Conner (Landman)	15 minutes	Approx. 5
Ralph Nelson (Geologist)	15 minutes	--
David Scolman (Geophysicist)	15 minutes	--

OPPONENT

	<u>EST. TIME</u>	<u>EXHIBITS</u>
Michael Clemenson (Geologist)	1 Hour	Est. 6
Terry Payne (Petroleum Engineer)	1 Hour	Est. 10

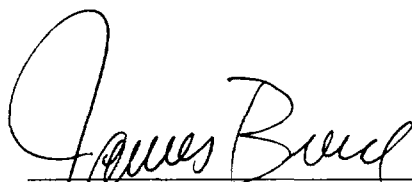
**PROCEDURAL MATTERS**

None applicable at this time.

Pre-Hearing Statement  
Case Nos. 11194 and 11195  
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Respectfully submitted,

Hinkle, Cox, Eaton, Coffield  
& Hensley, P.L.L.C., Ltd. Co.



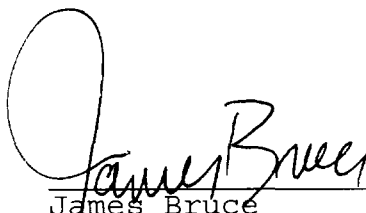
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James Bruce  
Post Office Box 2068  
Santa Fe, New Mexico 87504  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Pre-Hearing Statement was sent by facsimile this 14<sup>th</sup> day of June, 1995 to:

W. Thomas Kellahin  
Kellahin & Kellahin  
Post Office Box 2265  
Santa Fe, New Mexico 87504-2265



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James Bruce