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:

RECEIVED

AUG 1 5 1995

APPLICATION OF ARCH PETROLEUM INC. Oil Conservation Division FOR SEVEN UNORTHODOX INFILL OIL WELL LOCATIONS, LEA COUNTY, NEW MEXICO. No. 11344

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Campbell, Carr & Berge, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

ARCH PETROLEUM INC. c/o Chris Bezner 10 Desta Drive, Suite 420E Midland, TX 79705 (915) 685-1961 name, address, phone and contact person William F. Carr, Esq. Campbell, Carr & Berge, P.A. Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421

OTHER PARTY

ATTORNEY

name, address, phone and contact person

Pre-Hearing Statement NMOCD Case No. 11344 Page 2

STATEMENT OF CASE

APPLICANT

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

Arch Petroleum Inc., applicant in the above-styled cause, seeks approval to drill its C. E. Lamunyon Well Nos. 51, 52, 53, 54, 55 and 56 and its Saltmount Well No. 3 at unorthodox oil well locations in the Teague-Blinebry Pool. Each well will be an infill oil well on existing 40-acre oil spacing and proration units comprising the NE/4 NE/4 (Unit A), NE/4 NW/4 (Unit C), and the SE/4 SE/4 (Unit P) of Section 21; the NW/4 NW/4 (Unit D), SW/4 NW/4 (Unit E), and the SW/4 SW/4 (Unit M) of Section 22; and, the NE/4 NE/4 (Unit A) of Section 28 all in Township 23 South, Range 37 East.

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. 11344 Page 3

PROPOSED EVIDENCE

<u>APPLICANT</u>

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Chris Bezner, Engineer	10 Min.	Approximately 5
Jack Erwin, Geologist	10 Min.	Approximately 4

OTHER PARTY

WITNESSES (Name and expertise) EST. TIME

EXHIBITS

PROCEDURAL MATTERS

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

<u> La</u> Signature

Pre-Hearing Statement NMOCD Case No. 11344 Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Chris Bezner, Engineer	10 Min.	Approximately 5
Jack Erwin, Geologist	10 Min.	Approximately 4

OTHER PARTY

WITNESSES (Name and expertise) EST. TIME

EXHIBITS

PROCEDURAL MATTERS

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

Signature