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 6 1995

Oil Conservation Division

APPLICATION OF ANSON GAS CORPORATION FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NO. 11371

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

AnSon Gas Corporation c/o Charles E. Lundeen 3814 North Santa Fe Oklahoma City, OK (405) 528-0525 William F. Carr, Esq. Campbell, Carr & Berge, P.A. Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421

name, address, phone and contact person

ATTORNEY

name, address, phone and contact person

Pre-hearing Statement NMOCD Case No. 11371 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 Strawn formation, underlying the NW/4 NW/4 (Unit D) of Section 9, Township 17 South, Range 38 East, to form a standard 40-acre oil spacing and proration unit for any and all formations and/or pools developed on 40-acre oil spacing within said vertical extent. Said unit is to be dedicated to a well to be drilled at a standard oil well location thereon. 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 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. 11371 Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES EST. TIME EXHIBITS (Name and expertise)

Al Swanson, Landman 15 Min. Approximately 4

Hal E. Hawthorne, Geologist 10 Min. Approximately 1

OTHER PARTY

WITNESSES EST. TIME EXHIBITS (Name and expertise)

PROCEDURAL MATTERS

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

Signature