# 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. 11514

THE APPLICATION OF READ & STEVENS, INC. FOR AN UNORTHODOX INFILL GAS WELL LOCATION AND SIMULTANEOUS DEDICATION, CHAVES COUNTY, NEW MEXICO.

#### PRE-HEARING STATEMENT

This pre-hearing statement is submitted by UMC Petroleum Corporation as required by the Oil Conservation Division.

## APPEARANCES OF PARTIES

APPLICANT

OPPOSITION OR OTHER PARTY
UMC Petroleum Corporation 410 17th Street Suite 1400 Denver, CO 80202 Attn: Bob Mowry

ATTORNEY Read & Stevens, Inc.

United Bank Plaza
410 N. Penn, Suite 1000

Roswell, NM 88202

PADILLA LAW FIRM, P.A.

P.O. 2523

Santa Fe, NM 87504-2523 (505) 988-7577

> <u>ATTORNEY</u> James Bruce, Esq. Hinkle, Cox, Eaton, Coffield & Hensley, L.L.P. Post Office Box 2068 Santa Fe, NM 87504-2068 (505) 982-4554

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## STATEMENT OF CASE

#### APPLICANT

# **OPPOSITION**

Applicant seeks approval for an unorthodox infill gas well location in the Buffalo Valley-Pennsylvanian (Prorated) Gas Pool, for a well to be drilled 900 feet from the South line and 1980 feet from the West line (Unit 0) of Section 26, Township 15 South, Range 27 East. Said well is to be simultaneously dedicated with Applicant's existing Harris Federal Well No. 4, located at a standard gas well location in Unit P of Section 26, to form a standard 320-acre gas spacing and proration unit comprising the S% of Section 26. The proposed well is unnecessary to adequately drain the reservoir, and the application should be denied.

#### PROPOSED EVIDENCE

## APPLICANT

WITNESSES EST. TIME EXHIBITS

#### OPPOSITION

WITNESSES EST. TIME EXHIBITS

UMC may present a petroleum engineer

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## PROCEDURAL MATTERS

UMC has requested a two-week continuance due to the unavailability of its engineer to testify. UMC requests a decision on the continuance motion by Tuesday, April 30th.

HINKLE, COX, EATON, COFFIELD

& HENSLEY, L.L.P.

James Bruce

Post Office Box 2068

Santa Fe, New Mexico 87504-2068

(505) 982-4554

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **Pre-Hearing Statement** was delivered by facsimile transmission this 29th day of April 1996, to:

Ernest L. Padilla, Esq. PADILLA LAW FIRM, P.A. P.O. Box 2523
Santa Fe, NM 87504-2523
FAX: (505) 988-7592

James Bruce