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:

116 1 5 1996
Themservation Division

APPLICATION OF GILLESPIE-CROW, INC. FOR AN ALLOWABLE REDUCTION, LEA COUNTY, NEW MEXICO

CASE NO. 11599

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

APPEARANCES

APPLICANT'S ATTORNEY APPLICANT

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OPPONENT'S ATTORNEY OPPONENT

William F. Carr Yates Petroleum Corp.

OTHER PARTY'S ATTORNEY OTHER PARTY

J. Scott Hall Enserch Exploration Inc.

STATEMENT OF THE CASE

APPLICANT

Applicant is operator of the West Lovington Strawn Unit, a secondary recovery unit with a gas injection pressure maintenance project. Wells in the Unit are subject to production restrictions to prevent harm to the reservoir. Applicant seeks to restrict production from wells outside the Unit which are completed in the same the Strawn reservoir in which Unit wells are completed. Without the requested production restrictions, non-Unit wells benefit unfairly from the pressure maintenance project without having to pay a portion of its costs. This application affects a

portion of the West Lovington-Strawn Pool. The production restrictions would remain in place pending unitization of additional acreage outside the Unit.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME EXHIBITS

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

Applicant has been informed that Yates will be filing a motion to dismiss. Applicant proposes that at the August 22nd hearing, the motion to dismiss be argued, and no witnesses be presented. Yates' counsel concurs in this request.

> HINKLE, COX, EATON, COFFIELD & HENSLEY, L.L.P.

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