

**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. 11632

APPLICATION OF TEXACO EXPLORATION  
AND PRODUCTION INC., FOR  
COMPULSORY POOLING,  
SAN JUAN COUNTY, NEW MEXICO.

**PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Campbell, Carr, Berge & Sheridan, P.A.,  
as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Texaco Exploration and Production Inc.  
c/o Chuck Snure  
Post Office Box 2100  
Denver, CO 80237  
  
(303) 793-4511

name, address, phone and  
contact person

**ATTORNEY**

William F. Carr, Esq.  
Paul R. Owen, Esq.  
Campbell, Carr, Berge & Sheridan, P.A.  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421

**INTERESTED PARTY**

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**ATTORNEY**

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**STATEMENT OF CASE**

**APPLICANT**

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

Texaco Exploration and Production Inc., applicant in the above-styled cause, seeks an order pooling all gas interests in the Mesaverde formation, in and under the E/2 of Section 32, Township 30 North, Range 11 West. Said unit is to be dedicated to its Fed. State Com Well No. 2 to be drilled at a standard location 850 feet from the South line and 1700 feet (Unit O) from the East line of said Section 32. 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 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.)

**PROPOSED EVIDENCE**

APPLICANT

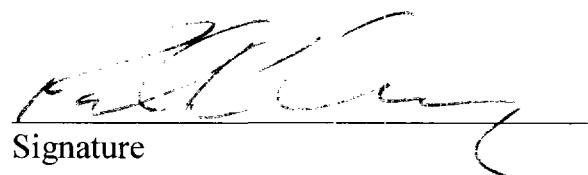
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Chuck Snure, Landman	15 Min.	Approximately 5
Dave Huxol, Geologist	15 Min.	Approximately 3

OTHER PARTY

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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**PROCEDURAL MATTERS**

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

  
Signature