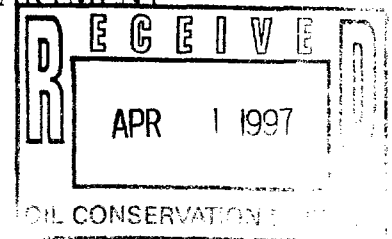


STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION



IN THE MATTER OF THE APPLICATION OF
BASS ENTERPRISES PRODUCTION CO. AND
SANTA FE ENERGY COMPANY FOR
RESCISSION OF ORDER NO. NSL-3745,
EDDY COUNTY, NEW MEXICO.

CASE 11713

IN THE MATTER OF THE APPLICATION OF
BASS ENTERPRISES PRODUCTION CO. TO
DRILL AND FOR SIMULTANEOUS DEDICATION
OR, IN THE ALTERNATIVE, SIMULTANEOUS
DEDICATION AND FOR UNORTHODOX
GAS WELL LOCATION,
EDDY COUNTY, NEW MEXICO.

CASE 11758

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

Bass Enterprises Production Co.
and Santa Fe Energy Co.

ATTORNEY

Ernest L. Carroll, Esq.
James E. Haas, Esq.
Losee, Carson, Haas & Carroll
P.O. Box 1720
Artesia, NM 88211-1720
(505) 746-3505

OTHER PARTY

Mewbourne Oil Company
c/o Steve Cobb
500 West Texas, Suite 1050
Midland, TX 79701
(915) 682-3715

ATTORNEY

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

name, address, phone and
contact person

STATEMENT OF CASE

APPLICANT

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

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.)

Mewbourne Oil Company, will present testimony in opposition to the simultaneous dedication of wells in Section 2, Township 19 South, Range 28 East.

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

OTHER PARTY

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

Ralph Moore, Geologist

5 Min.

Approximately 3

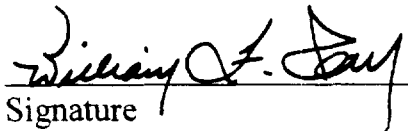
Bryan Montgomery,
Reservoir Engineer

20 Min.

Approximately 3

PROCEDURAL MATTERS

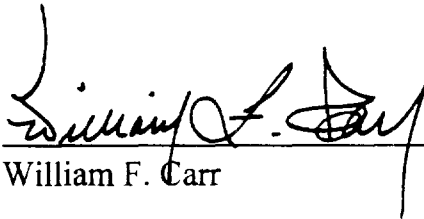
(Please identify any procedural matters which need to be resolved prior to hearing)


Signature

CERTIFICATE OF SERVICE

I hereby certify that I have caused a true and correct copy of the foregoing Pre-Hearing Statement to be telecopied and mailed this 1st day of April, 1997 to the following counsel of record:

Ernest L. Carroll, Esq.
James E. Haas, Esq.
Losee, Carson, Haas & Carroll
P.O. Box 1720
Artesia, NM 88211-1720
(505) 746-6316



William F. Carr

3-28-97

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

**IN THE MATTER OF THE APPLICATION OF
BASS ENTERPRISES PRODUCTION CO. AND
SANTA FE ENERGY COMPANY FOR RESCISSION
OF ORDER NSL-3745, EDDY COUNTY, NEW MEXICO**

CASE NO. 11713

**IN THE MATTER OF THE APPLICATION OF
BASS ENTERPRISES PRODUCTION CO. TO DRILL
AND FOR SIMULTANEOUS DEDICATION OR, IN THE
ALTERNATIVE, SIMULTANEOUS DEDICATION AND
FOR UNORTHODOX GAS WELL LOCATION,
EDDY COUNTY, NEW MEXICO**

Case No. 11758

PREHEARING STATEMENT

This prehearing statement is submitted by BASS ENTERPRISES PRODUCTION CO. as required by the Oil Conservation Division. A Motion to Consolidate the captioned two cases has been filed by Bass, and a consolidated prehearing statement is presented for filing in both cases.

APPEARANCES OF PARTIES

APPLICANT

**Bass Enterprises Production Co.
and Santa Fe Energy Co.**

**Ernest L. Carroll
James E. Haas
Losee, Carson, Haas &
Carroll, P. A.
P.O. Box 1720
Artesia, NM 88211-1720**

OPPOSITION

Mewbourne Oil Company

**William F. Carr
Campbell, Carr, Berge & Sheridan
P.O. Box 2208
Santa Fe, NM 87504-2208**

STATEMENT OF THE CASE

Bass and Santa Fe have filed an Application to Rescind Order NSL-3745, which order granted Mewbourne's administrative application for an unorthodox gas well location for its Scanlon Draw "35" State No. 1 Well 660' from the south line and 1980' from the west line of Section 35, Township 18 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.

Bass has filed an Application for Simultaneous Dedication and in the Alternative, Unorthodox Well Location, to drill its Turkey Track 2 State No. 2 Well and dedicate it to the existing 320-acre unit of the E/2 of Section 2, Township 19 South, Range 28 East, N.M.P.M., or, in the alternative, in the event Order NSL-3745 is not rescinded, that it be

allowed to drill at an unorthodox location corresponding to Mewbourne's location.

PROPOSED EVIDENCE

At this time Bass does not anticipate presenting witnesses or evidence in either case, in consideration of the previous technical evidence and testimony presented in 11713 by Bass. However, counsel will attend and, in the event opposition is presented at the hearing date, Bass reserves the right to rebut any such opposition with testimony and evidence.

Respectfully submitted,

LOSEE, CARSON, HAAS & CARROLL, P.A.

By: 

James E. Haas
Ernest L. Carroll
P. O. Box 1720
Artesia, New Mexico 88211-1720
(505) 746-3505

Attorneys for Bass Enterprises Production Co.
and Santa Fe Energy Company

I hereby certify that I caused to be mailed a true and correct copy of the foregoing to all counsel of record this March 28, 1997.


James E. Haas