

**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. 11821 (Readvertised and Reopened)<sup>f</sup>

IN THE MATTER OF THE AMENDED  
APPLICATION OF PALOMA RESOURCES, INC.  
FOR COMPULSORY POOLING,  
LEA 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**

Paloma Resources, Inc.  
c/o Jim Pierce  
200 West 1st Street  
Roswell, NM 88201  
(505) 626-7242

name, address, phone and  
contact person

**ATTORNEY**

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

**OPPOSITION OR OTHER PARTY**

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\_\_\_\_\_  
\_\_\_\_\_

name, address, phone and  
contact person

**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.)

Paloma Resources, Inc., applicant in the above-styled cause, seeks an order pooling all mineral interests in the Strawn formation in the S/2 SW/4 of Section 28, Township 16 South, Range 37 East, forming a standard 80-acre oil spacing and proration unit in the Undesignated West Casey-Strawn Pool. Said unit is to be dedicated to the Paloma Resources Inc. Shell Oil Company Home Stake Well No. 1 located 660 feet from the South and West lines of said Section 28 (Unit M) which, in accordance with Division Rule 111, is to be a directional wellbore whose Producing Interval will be located within its Producing Area and dedicated to a Project Area consisting of the S/2 SW/4 of Section 28, Township 16 South, Range 37 East. 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 operator of the well and a charge for risk involved in drilling said well.

OPPOSITION OR 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**  
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**PROPOSED EVIDENCE**

APPLICANT

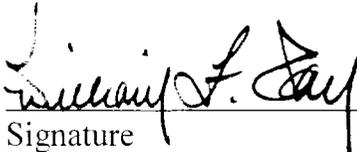
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Jim Pierce, Land	10 Min.	Approximately 5
Bruce Stubbs, Petroleum Engineer	15 Min.	Approximately 3

OPPOSITION

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