# 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. 11939

IN THE MATTER OF THE APPLICATION OF MANZANO OIL CORPORATION 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

Manzano Oil Corporation c/o Ken Barbe 1801 West Second Street Roswell, New Mexico 88201 (505) 623-1996

name, address, phone and contact person

## orporation William F. Carr, Esq.

Campbell, Carr, Berge & Sheridan, P.A. Post Office Box 2208
Santa Fe, New Mexico 87504

**ATTORNEY** 

(505) 988-4421

OPPOSITION OR OTHER PARTY	ATTORNEY

name, address, phone and contact person

Pre-hearing Statement NMOCD Case No. 11939 Page 2

#### STATEMENT OF CASE

#### **APPLICANT**

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

Manzano Oil Corporation, applicant in the above-styled cause, seeks an order pooling all mineral interests from the surface to the base of the Strawn formation, underlying the SE/4 SW/4 of Section 25, Township 17 South, Range 37 East, for all formations developed on 40-acre spacing. Applicant proposes to dedicate this pooled unit to its "SV" Grand Slam Well No. 1 to be drilled at a standard location 400 feet from the South line and 2310 feet from the West line (Unit N) of said Section 25. 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 the 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 NMOCD Case No. 11939 Page 3

#### PROPOSED EVIDENCE

#### **APPLICANT**

WITNESSES (Name and expertise)

EST. TIME

**EXHIBITS** 

Debbi Jeffers, Land

10 Min.

Approximately 5

Mike Brown, Geology

15 Min.

Approximately 3

#### **OPPOSITION**

WITNESSES

EST. TIME

**EXHIBITS** 

(Name and expertise)

#### PROCEDURAL MATTERS

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

Signature