

**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. 11993

APPLICATION OF JOHN H. HENDRIX  
CORPORATION FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.

OIL CONSERVATION DIV.  
98 JUL -6 PM 3:18

**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**

John H. Hendrix Corporation  
c/o Damian Barrett  
Post Office Box 3040  
Midland, TX 79702-3040  
(915) 684-4023

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

**INTERESTED PARTY**

Ann Yeager Hansen \_\_\_\_\_  
Henry Hansen \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**ATTORNEY**

Jim Bruce, Esq. \_\_\_\_\_  
612 Old Santa Fe Trail, Suite B \_\_\_\_\_  
Santa Fe, NM 87501 \_\_\_\_\_  
(505) 982-2043 \_\_\_\_\_

**STATEMENT OF CASE**

**APPLICANT**

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

John H. Hendrix Corporation, applicant in the above-styled cause, seeks an order pooling all mineral interests in all formations from the top of the Abo formation (approximately 7,000 feet) to the base of the Strawn formation developed on 40-acre spacing underlying the NE/4 NW/4, and in all formations developed on 80-acre spacing underlying the E/2 NW/4, including the Cass-Pennsylvanian Pool, of Section 16, Township 16 South, Range 37 East. This unit is to be dedicated to its Wood State Well No. 4 which will be drilled at a standard location 660 feet from the North line and 2310 feet from the West line (Unit C) of Section 16. Also to be considered will be the cost of drilling and completing the 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 the 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

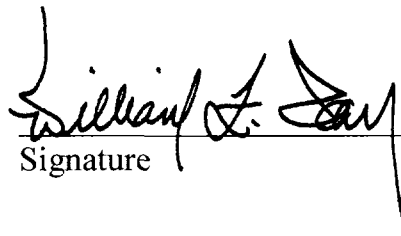
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Damian Barrett, Petroleum Engineer	30 Min.	Approximately 12

OTHER PARTY

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

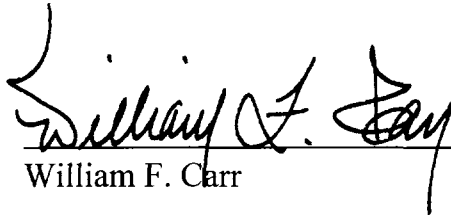
(Please identify any procedural matters which need to be resolved prior to hearing)

  
Signature

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused a true and correct copy of the foregoing Pre-Hearing Statement to be hand-delivered on this 16<sup>th</sup> day of July, 1998 to the following counsel of record:

James Bruce, Esq.  
612 Old Santa Fe Trail  
Suite B  
Santa Fe, New Mexico 87501

  
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William F. Carr