

LAW OFFICES

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

311 WEST QUAY AVENUE

P. O. BOX 1720

ARTESIA, NEW MEXICO 88211-1720

TELEPHONE
(505) 746-3505

FACSIMILE
(505) 746-6316

MARY LYNN BOGLE
ERNEST L. CARROLL
JOEL M. CARSON
JAMES E. HAAS
JOHN M. WYLIE
OF COUNSEL
A. J. LOSEE

July 17, 1998

VIA FACSIMILE AND FIRST CLASS MAIL

Ms. Lori Wrotenberry, Director
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87504

Re: Application of Bass Enterprises Production Co. for Non-Standard
Subsurface Oil Well Location, Case No. 12010

Dear Ms. Wrotenberry:

Enclosed for filing, please find the Prehearing Statement of Bass Enterprises Production Co.
for the July 23, 1998, hearing.

Very truly yours,

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



Ernest L. Carroll

ELC:kth

cc w/encl: Mr. J. Wayne Bailey, Bass Enterprises Production Co.

**BEFORE THE OIL CONSERVATION DIVISION
OF THE STATE OF NEW MEXICO**

**IN THE MATTER OF THE APPLICATION OF :
BASS ENTERPRISES PRODUCTION CO. FOR : CASE NO.12010
AN UNORTHODOX BOTTOMHOLE OIL WELL :
LOCATION, EDDY COUNTY, NEW MEXICO :**

PREHEARING STATEMENT

This prehearing statement is submitted by BASS ENTERPRISES PRODUCTION CO. as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Bass Enterprises Production Co.

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

OPPOSITION

Unknown

STATEMENT OF THE CASE

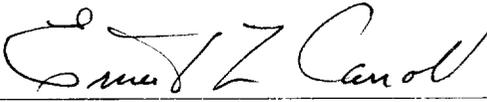
Bass has filed an application for a non-standard subsurface oil well location/producing area, seeking to recomplete its Monteith "C" Well No. 1 located at a standard surface oil well location 660' from the north line and 1830' from the east line (Unit B) of Section 13, Township 16 South, Range 36 East, by directionally drilling to a non-standard subsurface oil well location/producing area in the Northeast Lovington-Pennsylvanian Pool. The W/2 NE/4 of said Section 13 is to be dedicated to this well in order to form a standard 80-acre oil spacing and proration unit.

PROPOSED EVIDENCE

<u>WITNESS</u>	<u>NO. OF EXHIBITS</u>	<u>TIME</u>
Worth Carlin, Landman	5	15 - 20 mins.
George Hillis, Geology/Engineering	8	15 - 20 mins.

Respectfully submitted,

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

By: 

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

Attorneys for Bass Enterprises Production Co.