

**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. 12085

APPLICATION OF JOHN H. HENDRIX  
CORPORATION FOR COMPULSORY  
POOLING AND A HORIZONTAL WELL,  
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.

OIL & GAS DIVISION  
RECEIVED  
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**APPEARANCES OF PARTIES**

APPLICANT

ATTORNEY

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

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

INTERESTED PARTY

ATTORNEY

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

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 the Abo formation, Southeast Monument-Abo Pool, underlying the following described acreage in Section 16, Township 20 South, Range 37 East, and in the following manner: (a) the SE/4 NW/4 to form a standard 40-acre oil spacing and proration unit within this pool for a vertical wellbore; or, in the alternative (b) the E/2 NW/4 to form an 80-acre project area, as defined by Division Rule 111.A(4), by combining the two standard 40-acre oil spacing and proration units that comprise the SE/4 NW/4 and the NE/4 NW/4, for a horizontal wellbore. The applicant proposes to locate its Wood State Well No. 5 at a surface location 1650 feet from the North line and 2310 feet from the West line (Unit F) of Section 16 and drill to the Abo formation with either a straight vertical wellbore or to kick-off in a northerly direction with a horizontal drainhole. Also to be considered will be 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

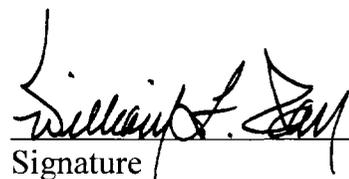
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Damian Barrett, Petroleum Engineer	30 Min.	Approximately 12

OTHER PARTY

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

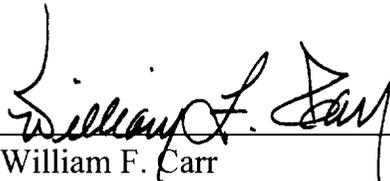
(Please identify any procedural matters which need to be resolved prior to hearing)

  
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 4<sup>th</sup> day of November, 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