

**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. 12179

59 MAY 11 AM 8:02

OIL CONSERVATION DIV.

APPLICATION OF ENERQUEST RESOURCES, L.L.C.
TO AMEND SPECIAL POOL RULES FOR THE
EAST HOBBS-SAN ANDRES POOL,
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

Enerquest Resource, L.L.C.
c/o Chris Renaud
Post Office Box 11150
Midland, TX 79702
(915) 685-3116
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

ATTORNEY

name, address, phone and
contact person

STATEMENT OF CASE

APPLICANT

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

Enerquest Resources, L.L.C., applicant in the above-captioned case seeks to amend the special rules for the East Hobbs-San Andres Pool, as promulgated by Division Order No. R-7511, to include the assignment at a special depth bracket allowable, pursuant to Division Rule 505.D, of 160 barrels of oil per day. The East Hobbs-San Andres Pool comprises portions of Section 25 of Township 18 South, Range 38 East, and Sections 29, 30, 31 and 32, of Township 18 South, Range 39 East.

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.)

PROPOSED EVIDENCE

APPLICANT

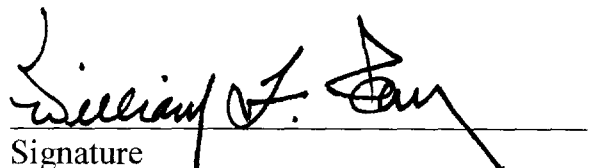
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Robert W. Floyd, Landman	10 Min.	Approximately 3
David A. Godsey, Geologist	15 Min.	Approximately 3
Christopher P. Renaud, Petroleum Engineer	15 Min.	Approximately 3

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
-----------------------------------	-----------	----------

PROCEDURAL MATTERS

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


Signature