

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. 12247

OIL CONSERVATION DIV
09 SEP 14 PM 12: 10

APPLICATION OF AMERISTATE OIL & GAS, INC.
FOR COMPULSORY POOLING, EDDY 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

Ameristate Oil & Gas, Inc.
Attn: Mark Nearburg
211 Ranch Road 620 South, Suite 120
Austin, Texas 78734
(512) 266-6007

ATTORNEY

William F. Carr, Esq.
Paul R. Owen, Esq.
Campbell, Carr, Berge & Sheridan, P.A.
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

OPPOSITION OR OTHER PARTY

ATTORNEY

None Known

STATEMENT OF CASE

APPLICANT

Ameristate Oil & Gas, Inc., applicant in the above-captioned case, seeks an order pooling all minerals from the surface to the base of the Morrow formation in Section 30, Township 17 South, Range 25 East, Eddy County, New Mexico, as follows:

- a. underlying the N/2, forming a standard 320-acre oil spacing and proration unit for formations and/or pools developed on 320-acre spacing within that vertical extent,

which presently includes, but is not necessarily limited to, the Richard Knob Atoka-Morrow Gas Pool;

b. pooling all minerals from the surface to the base of the Morrow formation underlying the NE/4 of Section 30, forming a standard 160-acre oil spacing and proration unit for formations and/or pools developed on 160-acre spacing within that vertical extent, which presently includes, but is not necessarily limited to, the Eagle Creek-Strawn Gas Pool;

c. pooling all minerals from the surface to the base of the Morrow formation underlying the S/2 NE/4 of Section 30, forming a standard 80-acre oil spacing and proration unit for all formations and/or pools developed on 80-acre spacing within that vertical extent; and,

d. the SW/4 NE/4 to form a standard 40-acre gas spacing and proration unit for formations and/or pools developed on 40-acre spacing within that vertical extent which presently includes, but is not necessarily limited to, the Undesignated Eagle Creek-San Andres Pool.

e. this pooled unit to be dedicated to Ameristate's proposed Maneater Federal Com Well No. 1, to be drilled at a standard location _____ feet from the South line and _____ feet from the West line of said Section 30.

OPPOSITION OR OTHER PARTY

None Known

PROPOSED EVIDENCE

APPLICANT

<u>Witness</u>	<u>Est. Time</u>	<u>Exhibits</u>
Mark Nearburg, Landman	20 Min.	Approximately 4
Louis Mazzullo, RG, Geologist	20 Min.	Approximately 4

OPPOSITION

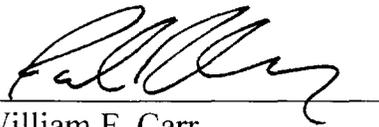
<u>Witness</u>	<u>Est. Time</u>	<u>Exhibits</u>
	<u>None Known</u>	

PROCEDURAL MATTERS

None Known

Respectfully submitted,

CAMPBELL, CARR, BERGE &
SHERIDAN, P. A.



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ATTORNEYS FOR APPLICANT
AMERISTATE OIL & GAS INC.