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11-30-99

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

CASE NO. 12295

**APPLICATION OF SANTA FE SNYDER CORPORATION
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Santa Fe Snyder Corporation as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

Santa Fe Snyder Corporation
550 West Texas Ave. Ste 1330
Midland, Texas 79701
(915) 686-6712
attn: Mr. Steve Smith

ATTORNEY

W. Thomas Kellahin
KELLAHIN AND KELLAHIN
P.O. Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285

STATEMENT OF CASE

Santa Fe Snyder Corporation has a working interest ownership in the oil and gas minerals underlying the E/2 of Section 11, T21S, R34E, NMPM, Lea County, New Mexico.

Santa Fe Snyder Corporation has proposed to the other working interest owners that this well be drilled and completed for potential production from any formation from the surface to the base of the Morrow formation to be dedicated to a 320-acre gas spacing and proration unit consisting of the E/2 of this section for production from any formation spaced on 320-acres.

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Despite its good faith efforts, Santa Fe Snyder Corporation has been unable to obtain a written voluntary agreement from all of the working interest and or mineral interest owners. Therefore, Santa Fe Snyder Corporation needs an order of the Division pooling the identified and described mineral interests in order to protect correlative rights and prevent waste.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES

EST. TIME

EXHIBITS

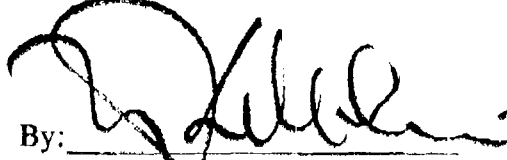
Steve Smith (landman)
Steve Helki
(geologist)

15 Min.
15 Min.

6 exhibits
3 exhibits

PROCEDURAL MATTERS

KELLAHIN AND KELLAHIN



By: _____
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