

MA
4-17-00

**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. 12384

00 APR 14 PM 12:53

OIL CONSERVATION DIV.

**APPLICATION OF LOUIS DREYFUS NATURAL GAS
FOR COMPULSORY POOLING,
CHAVES 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

Louis Dreyfus Natural Gas Corporation
Attn: Joe Hammond
14000 Quail Springs Parkway, Suite 600
Oklahoma City, OK 73134-2600
(405) 479-1300

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

STATEMENT OF CASE

APPLICANT

Applicant seeks an order pooling all mineral interests from the depth of 4000 feet to the base of the Morrow formation, Undesignated South Empire (Morrow) Gas Pool, underlying the following described acreage in Section 34, Township 17 South, Range 28 East in the following manner: (a) the W/2 for any formations and/or pools developed on 320-acre spacing; (b) the NW/4 for any formations and/or pools developed on 160-acre spacing; (c) the W/2 NW/4 for any formations and/or pools developed on 80-acre spacing; and (d) the SW/4 NW/4 for any formations and/or pools developed on 40-acre spacing. Said units are to be dedicated to Applicant's Geronimo 34 State Com Well No. 1 to be drilled at a standard location in the NW/4 of said Section 34. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of Louis Dreyfus Natural Gas as operator of the well and a charge for risk involved in drilling said well. Said area is located approximately 14 miles East of Artesia, New Mexico.

OPPOSITION OR OTHER PARTY

PROPOSED EVIDENCE

APPLICANT

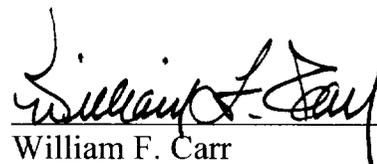
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Joe Hammond (Landman)	Approx. 15 min.	Approx. 6
Dale Shipley (Geologist)	Approx. 10 min.	Approx. 3

OPPOSITION

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

Louis Dreyfus Natural Gas Company has none at this time.



William F. Carr
ATTORNEY FOR LOUIS DREYFUS
NATURAL GAS COMPANY