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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. 12385**

**APPLICATION OF TEXACO EXPLORATION AND PRODUCTION, INC.  
FOR COMPULSORY POOLING  
CHAVES COUNTY, NEW MEXICO.**

OIL CONSERVATION DIV.  
00 APR 14 PM 12:53

**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**

Texaco Exploration and Production, Inc.  
Attn: Mike Mullins  
P.O. Box 3109  
Midland, TX 79702  
(915) 688-4488  
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**

## **STATEMENT OF CASE**

### APPLICANT

Application of Texaco Exploration and Production Inc. for compulsory pooling, Chaves County, New Mexico. Applicant in the above-styled cause seeks an order pooling all mineral interests in all formations from the surface to the base of the Morrow formation in the W/2 of Section 36, Township 15 South, Range 31 East, N.M.P.M., Chaves County, New Mexico, in the following manner: the W/2 for all formations and/or pools developed on 320-acre spacing; the NW/4 for all formations/pools developed on 160-acre spacing; the S/2 NW/4 for all formations/pools developed on 80-acre spacing; and, the SE/4 NW/4 for all formations/pools developed on 40-acre spacing. Said units are to be dedicated to the Dulce "36" State Com No. 1 Well, to be drilled as a wildcat well at a standard location in the NW/4 of said Section 36.

Also to be considered will be the cost of drilling and completing said well; the allocation of the cost thereof and of actual operating costs and charges for supervision; designation of applicant as operator of the well; and, a charge for risk involved in drilling said well. Said area is located approximately 7 miles North of Maljamar, New Mexico.

### 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

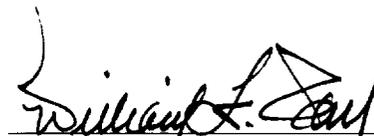
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Mike Mullins (Landman)	Approx. 15 min.	Approx. 7
Mike Cervantes (Petroleum Geologist)	Approx. 10 min.	Approx. 3

OPPOSITION

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

Texaco Exploration and Production, Inc. has none at this time.



William F. Carr  
ATTORNEY FOR TEXACO  
EXPLORATION AND PRODUCTION,  
INC.

