

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

OIL CONSERVATION DIV.  
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**IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
DIVISION FOR THE PURPOSE OF  
CONSIDERING:**

**CASE NO. 12411**

**APPLICATION OF ENERQUEST OIL & GAS  
FOR COMPULSORY POOLING  
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 Oil & Gas, Inc.  
Attn: Bobby Floyd  
P.O. Box 11150  
Midland, TX 79702  
(915) 685-3116

**ATTORNEY**

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

**OPPOSITION**

Doyle Hartman, Oil Operator  
500 N. Main  
Midland, TX 79701  
(915) 684-4011

**OPPOSING COUNSEL**

J.E. Gallegos, Esq.  
Gallegos Law Firm  
460 St. Michael's Drive, Suite 300  
Santa Fe, NM 87505-7602  
(505) 983-6686

## STATEMENT OF CASE

### APPLICANT

Application of EnerQuest Oil & Gas, L.L.C. for compulsory pooling, Lea County, New Mexico. Applicant in the above-styled cause seeks an order pooling all mineral interests in all formations developed on 160-acre spacing in the SW/4 of Section 18, Township 20 South, Range 39 East, NMPM, including but not limited to the Blinebry formation, Blinebry Oil and Gas Pool. Said unit is to be dedicated to its McCasland "18" Fee Well No. 1 located at a standard location in the SW/4 of said Section 18 which has been drilled and completed in the Blinebry formation. 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, and designation of EnerQuest Resources, L.L.C. as operator of the well. Said area is located approximately 4 miles southeast of Nadine, New Mexico.

## PROPOSED EVIDENCE

### APPLICANT

#### WITNESSES

Craig Clark  
(Landman)

#### EST. TIME

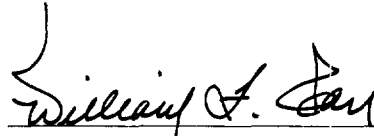
Approx. 15 min.

#### EXHIBITS

Approx. 6

**PROCEDURAL MATTERS**

EnerQuest Oil & Gas, L.L.C. has none at this time.

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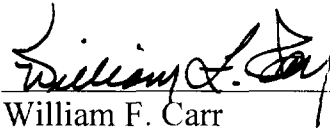
William F. Carr

Attorney for EnerQuest Oil & Gas, L.L.C.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21<sup>st</sup>, day of August, 2000 I have caused to be fax-delivered, a copy of our Prehearing Statement in the above-captioned case to the following named parties:

Gallegos Law Firm, P.C.  
Attn: J. E. Gallegos, Esq.  
460 St. Michael's Drive, Suite 300  
Santa Fe, NM 87505-7602

A handwritten signature in black ink, appearing to read "William F. Carr", is written over a horizontal line.

William F. Carr

Attorney for EnerQuest Oil & Gas, L.L.C.