

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

IN THE MATTER OF THE APPLICATION OF  
PENDRAGON ENERGY PARTNERS, INC.  
PURSUANT TO ORDER NO. R-11133-A TO  
RESTORE THE CHACO 2-R PICTURED CLIFFS  
WELL TO PRODUCTION, SAN JUAN COUNTY,  
NEW MEXICO

Case No. 12479

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OIL CONSERVATION DIV.

**PRE-HEARING STATEMENT**

This prehearing statement is submitted by Applicant, Pendragon Energy Partners, Inc., as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Pendragon Energy Partners, Inc.  
621 17<sup>th</sup> Street, Suite 750  
Denver, CO 80293  
(303) 296-9402

**ATTORNEY**

J. Scott Hall  
Miller, Stratvert & Torgerson, P.A.  
Post Office Box 1986  
Santa Fe, NM 87504-1986  
(505) 989-9614

**OPPOSITION**

Whiting Petroleum Corporation  
T.H. McElvain Oil & Gas LP  
Maralex Resources, Inc.  
1700 Broadway, Suite 2300  
Denver, CO 80202  
(303) 298-1400

**ATTORNEY**

J.E. Gallegos  
460 St. Michael's Drive # 300  
Santa Fe, NM 87505  
(505) 983-6686

**STATEMENT OF CASE**

**APPLICANT**

Applicant seeks Division approval pursuant to the provisions of Order R-11133-A to restore the shut-in Chaco 2-R Pictured Cliffs gas well to production.  
  
(See decretal paragraph 4, Order No. R-11133-A).

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
Al Nicol: Geological Engineer	30 min.	8
Dave Cox: Petroleum Engineer	30 min.	8

OPPOSITION

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

Whiting's Motion to Dismiss Or, Alternatively, For Stay of Proceedings.  
Pendragon's Motion to Quash.



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Signature

**Pre-hearing Statement**  
**NMOCD Case No. 12479**  
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**CERTIFICATE OF MAILING**

I hereby certify that a true and correct copy of the foregoing was forwarded to counsel of record on the 18 day of August 2000, as follows:

J.E. Gallegos, Esq.  
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Santa Fe, New Mexico 87505  
(505) 983-6686