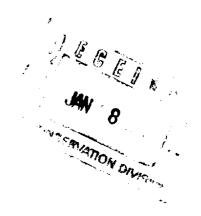
STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

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



APPLICATION OF MAYNARD OIL COMPANY FOR SIMULTANEOUS DEDICATION IN THE WILSON-MORROW GAS POOL LEA COUNTY, NEW MEXICO.

CASE NO. 12539

PRE-HEARING STATEMENT

This Prehearing Statement is submitted by HOLLAND & HART LLP and CAMPBELL & CARR, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Maynard Oil Company Attn: Cassandra Foster 8080 North Central Expressway, Suite 660 Dallas, Texas 75206 (214) 891-8461 ATTORNEY

Michael H. Feldewert , Esq. HOLLAND & HART LLP and CAMPBELL & CARR Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 Pre-hearing Statement NMOCD Case No. 12539 Page 2

STATEMENT OF CASE

<u>APPLICANT</u>

Applicant seeks authorization to simultaneously dedicate its existing Wilson Deep Unit Well No. 1 (located 2080 feet from the North and West lines - Unit F) and its proposed Wilson Unit Well No. 2 (to be located at a standard location 660 feet from the North and West lines - Unit D) to a standard 320-acre gas spacing unit comprised of the W/2 of Section 13, T-21-S, R-34-E, NMPM. This location is approximately 16 miles west-northwest of Eunice, New Mexico.

This case was re-opened and re-advertised to address on apparent notice defect for Phillips Petroleum Company

PROPOSED EVIDENCE

<u>APPLICANT</u>

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
None	Approx. 10 minutes	One
<u>OPPOSITION</u>		
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
None		None
PROCEDURAL MATTERS		

Maynard Oil Company has none at this time.

HOLLAND & HART LLP and CAMPBELL & CARR

By Michael H. Feldewert, Esq.

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