

BEFORE THE

OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

IN THE MATTER OF THE APPLICATION OF
DAVID H. ARRINGTON OIL AND GAS, INC.
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO

CASE NO. 12922

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Miller, Stratvert & Torgerson, P.A. (J. Scott Hall) on behalf of David H. Arrington Oil and Gas, Inc., as required by the Oil Conservation Division.

APPEARANCES

APPLICANT'S ATTORNEY

APPLICANT

J. Scott Hall, Esq.
Miller, Stratvert & Torgerson, P.A.
214 West Wall, Suite 400
Post Office Box 1986
Santa Fe, New Mexico 87504
(505) 989-9614

OPPONENT'S ATTORNEY

OPPONENT

None.

OTHER PARTY'S ATTORNEY

OTHER PARTY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order pooling all mineral interests underlying the following described acreage in Section 34, Township 15 South, Range 34 East, NMPM: a.) E/2 to form a standard 320-acre

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stand-up gas spacing and proration unit (“the 320-acre Unit”) for any and all formations and/or pools developed on 320-acre spacing within that vertical extent, which presently include but are not necessarily limited to the Edison North-Morrow Gas Pool; b.) SE/4 to form a standard 160-acre spacing and proration unit (“the 160-acre Unit”) for any and all formations and/or pools developed on 160-acre spacing within that vertical extent; c.) N/2 SE/4 to form a standard 80-acre stand-up oil spacing and proration unit (“the 80-acre Unit”) for any and all formations and/or pools developed on 80-acre spacing within that vertical extent which presently includes, but is not limited to, the undesignated North Edison Strawn Pool; and d.) the NE/4 SE/4 to form a standard 40-acre spacing and proration unit (“the 40-acre Unit”) for any and all formations and/or pools developed on 40-acre spacing within that vertical extent, which presently include but are not necessarily limited to the Townsend Permo-Penn Pool. Said units are to be dedicated to Applicant’s proposed Huma Huma 34 Well No. 1 to be drilled at a standard 320-acre spacing and proration unit gas well location 1700 feet from the South line and 950 feet from the East line in the SE/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 David H. Arrington Oil and Gas, Inc. or its designee as operator of the well and a charge for risk involved in drilling said well.

OPPOSITION OR OTHER PARTY

None.

PROPOSED EVIDENCE

APPLICANT

WITNESSES:	Est. Time	No. of Exhibits
Ennick Diffy (Landman)	20 Minutes	4
Bill Baker (Geologist)	20 Minutes	5
Chuck Sledge (Petroleum Engineer)	20 Minutes	2

OPPOSITION

WITNESSES	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

MILLER, STRATVERT & TORGERSON, P.A.

By: 

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Attorneys for David H. Arrington Oil and Gas, Inc.

Certificate of Mailing

I hereby certify that a true and correct copy of the foregoing was delivered to counsel of record on the 30th day of August, 2002, as follows:

David Brooks,, Esq.
New Mexico Oil Conservation Division
1220 St. Francis Dr.
Santa Fe, New Mexico



J. Scott Hall