

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

JUNE 10 1991

OIL CONSERVATION DIVISION

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

CASE NO. 10353

APPLICATION OF COLLINS & WARE  
FOR COMPULSORY POOLING, LEA  
COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by CHEVRON  
USA, INC. as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

APPLICANT  
(name, address, phone  
and contact person)

Collins & Ware, Inc.

ATTORNEY

William F. Carr, Esq.  
Campbell & Black, P.A.  
Post Office Box 2208  
Santa Fe, New Mexico  
87504-2088

OPPOSITION OF OTHER PARTY  
(name, address, phone  
and contact person)

Chevron U.S.A., Inc.  
Post Office Box 1150  
Midland, Texas 79702  
ATTN: Sam Martin

ATTORNEY

W. Thomas Kellahin  
Kellahin, Kellahin &  
Aubrey  
Post Office Box 2265  
Santa Fe, New Mexico  
87504-2265

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or other wise state the position of the party filing this statement.)

Chevron objects to the compulsory pooling of its interest in the SW/4 of Section 20, T22S, R33E, Lea County, New Mexico by the applicant's attempt to pool the W/2 of this Section.

Applicant's request violates Section 70-2-17(c) in that it proposes a pooling under terms and conditions that are not fair and reasonable.

Applicant can form on a voluntary basis a 320-acre spacing unit consisting of the N/2 of Section 20. Applicant's request is not supported by substantial geologic evidence justifying the inclusion of the Chevron acreage.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES  
(NAME AND EXPERTISE)

EST. TIME

EXHIBITS

OPPOSITION

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(NAME AND EXPERTISE)

EST. TIME

EXHIBITS

George Burg (Geologist) 30 Min.

Geologic  
displays and  
production  
information

**PROCEDURAL MATTERS**

(Please identify and procedural matters which  
need to be resolved prior to the hearing)

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin

Post Office Box 2265

Santa Fe, New Mexico 87504-2265

(505) 982-4285

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