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:

CASE NO. 10368

RECEIVED

AUG 1 6 1991

APPLICATION OF JOHNNY G. JONES FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

OIL CONSERVATION DIV. SANTA FE

PRE-HEARING STATEMENT

This prehearing statement is submitted by William F. Carr, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Johnny G. Jones_____ Post Office Box 5126_____ Midland, Texas 79704_____

name, address, phone and contact person

OPPOSITION OR OTHER PARTY

ATTORNEY

William F. Carr Campbell, Carr, Berge & Sheridan Post Office Box 2208 Santa Fe, New Mexico 87504

(505) 988-4421_____

ATTORNEY

name, address, phone and contact person

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STATEMENT OF CASE

<u>APPLICANT</u>

Johnny G. Jones, applicant, seeks an order pooling all mineral interests from the surface to a depth of 13,800 feet, which correlates approximately to the base of the Strawn formation, underlying the SW/4 NE/4 (Unit G) of Section 34, Township 24 South, Range 34 East, forming a standard 40-acre oil spacing and proration unit for any and all formations and/or pools developed on 40-acre spacing within said vertical extent, which presently includes only the Pitchfork Ranch-Strawn Pool. Said unit is to be dedicated to its existing Moore "34" Com Well No. 1 located 1980 feet from the North and East lines of said Section 34, which was plugged and abandoned in January 1988 and was re-entered on March 30, 1990. 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 applicant as operator of the well and a charge for risk involved in drilling said well.

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.) Pre-hearing Statement NMOCD Case No. 10368 Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Dee Anderson, (land)	10 Min.	Approximately 5
George Hoover (Petroleum Engineer)	5 Min.	Approximately 2

OPPOSITION

WITNESSES (Name and expertise) EST. TIME

EXHIBITS

PROCEDURAL MATTERS

william & Day Signature