

LAW OFFICES

LOSEE, CARSON, HAAS & CARROLL, P. A.

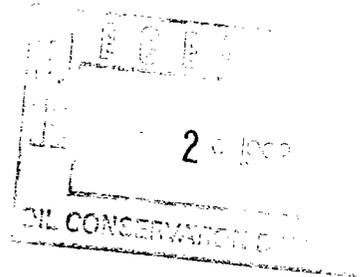
ERNEST L. CARROLL  
JOEL M. CARSON  
DEAN B. CROSS  
JAMES E. HAAS  
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300 YATES PETROLEUM BUILDING  
P. O. DRAWER 239  
ARTESIA, NEW MEXICO 88211-0239

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September 20, 1993

New Mexico Oil Conservation Division  
310 Old Santa Fe Trail, Room 206  
Santa Fe, New Mexico 87503



Attn: Florine

Re: Enron Oil & Gas Company, Case No. 10827

Dear Florine:

Enclosed herewith, for the above numbered and styled cause, please find my Entry of Appearance on behalf of Arco Oil and Gas Company, together with my Motion for Continuance. Thank you for your assistance in this matter.

Yours truly,

LOSEE, CARSON, HAAS & CARROLL, P.A.

  
Ernest L. Carroll

ELC:bjk  
Enclosures

cc: Mr. John E. Lodge  
Arco Oil and Gas Company

BEFORE THE OIL CONSERVATION DIVISION  
OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION OF :  
ENRON OIL & GAS COMPANY FOR COMPULSORY :  
POOLING AND AN UNORTHODOX GAS WELL :  
LOCATION, EDDY COUNTY, NEW MEXICO :  
:

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CASE NO. 10827

RECEIVED

2 1993

ENTRY OF APPEARANCE

COMES NOW LOSEE, CARSON, HAAS & CARROLL, P.A. (Ernest L. Carroll), and enters its appearance herein for Arco Oil and Gas Company, and requests that it be given notice of all future hearings in the above numbered and styled cause.

LOSEE, CARSON, HAAS & CARROLL, P.A.

By:

  
Ernest L. Carroll  
P. O. Drawer 239  
Artesia, New Mexico 88211-0239  
(505)746-3505

Attorneys for Arco Oil and Gas Company

BEFORE THE OIL CONSERVATION DIVISION  
OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION OF :  
ENRON OIL & GAS COMPANY FOR COMPULSORY : CASE NO. 10827  
POOLING AND AN UNORTHODOX GAS WELL :  
LOCATION, EDDY COUNTY, NEW MEXICO :  
:

2 1993

MOTION FOR CONTINUANCE

COMES NOW LOSEE, CARSON, HAAS & CARROLL, P.A. (Ernest L. Carroll), attorneys for Arco Oil and Gas Company, and moves the Oil Conservation Division for a continuance of the hearing set in the above numbered and styled cause, and as its reasons therefor states:

1) Attorneys for Arco have just been hired to represent Arco and will not have adequate time to prepare for said hearing.

2) Attorneys for Arco have been advised that Bill Carr, counsel for Enron, has a conflict of interest and will be withdrawing; however, Mr. Carr is unavailable till Wednesday, September 22, 1993, to verify that situation or to discuss a continuance date.

3) Representatives of Arco and Enron have met, and there may be a possibility of negotiating an agreement between the parties if a postponement is granted.

Respectfully submitted,

LOSEE, CARSON, HAAS & CARROLL, P.A.

By:   
Ernest L. Carroll  
P. O. Drawer 239  
Artesia, New Mexico 88211-0239  
(505) 746-3505

Attorneys for Arco Oil and Gas Company

**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. 10827

APPLICATION OF ENRON OIL & GAS  
COMPANY FOR COMPULSORY POOLING AND  
AN UNORTHODOX GAS WELL LOCATION,  
EDDY COUNTY, NEW MEXICO.

RECEIVED  
JUL 10 1997

**PRE-HEARING STATEMENT**

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

**APPEARANCES OF PARTIES**

**APPLICANT**

**ATTORNEY**

Enron Oil & Gas Company  
Post Office Box 2267  
Midland, Texas 79702  
Attn: Patrick J. Tower

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

(915) 686-3758 \_\_\_\_\_  
name, address, phone and  
contact person

(505) 988-4421 \_\_\_\_\_

**OPPOSITION OR OTHER PARTY**

**ATTORNEY**

ARCO Oil and Gas Company \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

name, address, phone and  
contact person

**STATEMENT OF CASE**

APPLICANT

Enron Oil & Gas Company, applicant in the above-styled cause, seeks an order pooling all mineral interests from the surface to the base of the Morrow formation underlying the S/2 of Section 35, Township 17 South, Range 30 East. Said unit is to be dedicated to its Cedar Lake 35 Federal Com Well No. 2 to be drilled at an unorthodox location 990 feet from the South and East lines of said Section 35. 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 the operator of the well and a charge for risk involved in drilling and completing 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.)

**PROPOSED EVIDENCE**

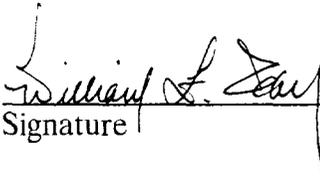
APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Patrick J. Tower, (Landman)	10 Min.	Approximately 3
Barry Zinz, (Geologist)	15 Min.	Approximately 3
Randy Cate, (Engineer)	10 Min.	Approximately 2

OPPOSITION

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

  
Signature

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

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

CASE NO. 10746 (*De Novo*)

APPLICATION OF DEVON ENERGY  
CORPORATION FOR SPECIAL POOL RULES,  
EDDY COUNTY, NEW MEXICO.

**PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Campbell, Carr, Berge & Sheridan, P.A., as required by the Oil Conservation Commission.

**APPEARANCES OF PARTIES**

**APPLICANT**

Devon Energy Corporation \_\_\_\_\_  
c/o Ken Gray \_\_\_\_\_  
20 North Broadway \_\_\_\_\_  
Oklahoma City, Oklahoma 73102-8260  
(405) 235-3611 \_\_\_\_\_

name, address, phone and  
contact person

**ATTORNEY**

William F. Carr, Esq. \_\_\_\_\_  
Campbell, Carr, Berge & Sheridan, P.A.  
Post Office Box 2208 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_  
(505) 988-4421 \_\_\_\_\_

**OPPOSITION OR OTHER PARTY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

name, address, phone and  
contact person

**ATTORNEY**

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\_\_\_\_\_  
\_\_\_\_\_

**STATEMENT OF CASE**

**APPLICANT**

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

Devon Energy Corporation, applicant in the above-captioned cause, seeks the promulgation of special rules for the East Catclaw Draw-Delaware Pool located in Section 9, Township 21 South, Range 26 East, including provisions for a gas-oil limitation of 6000 cubic feet of gas per barrel of oil.

**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

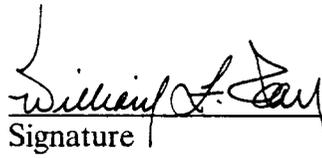
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Dick Morrow, Petroleum Engineer	20 Min.	Approximately 11

OPPOSITION

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

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

  
Signature