

OIL CONSERVATION DIVISION LAW OFFICES

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

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MARY LYNN BOGLE

June 3, 1994

VIA FACSIMILE AND FIRST CLASS MAIL

Mr. William J. LeMay, Director
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Re: Arco Permian Appl. for Compulsory Pooling,
Case No. 10993

Anadarko Appl. for Compulsory Pooling, Case
No. 10996

Clark/Matador Applications for Compulsory Pooling,
Case Nos. 11000 and 11001

Dear Mr. LeMay:

I am transmitting herewith Arco Permian's Prehearing Statement for filing in the above-referenced Case No. 10993.

Also enclosed is an Entry of Appearance on behalf of C. W. Stumhoffer and C. Daniel Walker for filing in the Anadarko case (10996) listed above.

I am also enclosing M. Craig Clark's Consolidated Prehearing Statement for filing in cases 11000 and 11001.

Thank you for your assistance.

Very truly yours,

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



Ernest L. Carroll

ELC:kth

Encl.

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

JUN 8 1967

IN THE MATTER OF THE APPLICATION OF :
ANADARKO PETROLEUM CORPORATION FOR :
CUMPULSORY POOLING, LEA COUNTY, : CASE NO. 10996
NEW MEXICO :
_____ :

ENTRY OF APPEARANCE

COMES NOW Ernest L. Carroll, Losee, Carson, Haas & Carroll, P. A.,
an hereby enters his appearance in the above-referenced case on behalf
of C. W. Stumhoffer, and C. Daniel Walker.

Respectfully submitted,

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

By:

Ernest L. Carroll
Ernest L. Carroll

P. O. Drawer 239

Artesia, New Mexico 88211-0239

(505)746-3505

Attorneys for C. W. Stumhoffer and
C. Daniel Walker

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

IN THE MATTER OF THE APPLICATION OF :
ANADARKO PETROLEUM CORPORATION FOR :
CUMPULSORY POOLING, LEA COUNTY, : CASE NO. 10996
NEW MEXICO :
_____ :

ENTRY OF APPEARANCE

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an hereby enters his appearance in the above-referenced case on behalf
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Respectfully submitted,

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

By:

Lawrence S. Haas for Ernest L. Carroll
Ernest L. Carroll

P. O. Drawer 239

Artesia, New Mexico 88211-0239

(505)746-3505

Attorneys for C. W. Stumhoffer and
C. Daniel Walker

BEFORE THE

OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

APPLICATION OF ANADARKO
PETROLEUM CORPORATION
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.

No. 10996

ENTRY OF APPEARANCE

COMES NOW CAMPBELL, CARR, BERGE & SHERIDAN, P.A., and hereby
enters its appearance in the above referenced case on behalf of Mewbourne Oil Company.

Respectfully submitted,

CAMPBELL, CARR, BERGE
& SHERIDAN, P.A.,

By: 

WILLIAM F. CARR

Post Office Box 2208

Santa Fe, New Mexico 87504

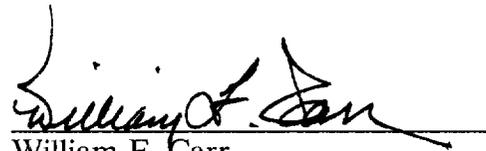
Telephone: (505) 988-4421

ATTORNEYS FOR MEWBOURNE
OIL COMPANY

CERTIFICATE OF MAILING

I hereby certify that on this 1st day of July, 1994, I have caused to be mailed a copy of our Entry of Appearance in the above-captioned case to:

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


William F. Carr

OIL CONSERVATION DIVISION

LAW OFFICES

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

ERNEST L. CARROLL

JOEL M. CARSON
DEAN B. CROSS
JAMES E. HAAS
A. J. LOSEE

MARY LYNN BOGLE

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July 27, 1994

Mr. William J. LeMay, Director
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

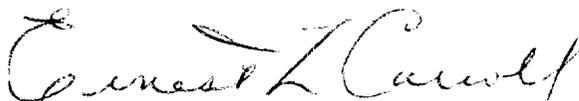
Re: Application of Anadarko Petroleum Corp., Case
No. 10996

Dear Mr. LeMay:

Enclosed herewith is an Entry of Appearance on behalf of Murjo
Oil and Royalty, in duplicate, for filing in the above-referenced
cause of action.

Very truly yours,

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



Ernest L. Carroll

ELC:kth
Encl.

xc w/encl: Mr. Thomas Kellahin

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

IN THE MATTER OF THE APPLICATION OF :
ANADARKO PETROLEUM CORPORATION FOR :
CUMPULSORY POOLING, LEA COUNTY, : CASE NO. 10996
NEW MEXICO :
_____ :

ENTRY OF APPEARANCE

COMES NOW Ernest L. Carroll, Losee, Carson, Haas & Carroll, P. A.,
and hereby enters his appearance in the above-referenced case on behalf
of MURJO OIL AND ROYALTY.

Respectfully submitted,

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

By:



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

2 1994

Attorneys for Murjo Oil and Royalty

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

IN THE MATTER OF THE APPLICATION OF :
ANADARKO PETROLEUM CORPORATION FOR :
CUMPULSORY POOLING, LEA COUNTY, : CASE NO. 10996
NEW MEXICO :
:

PREHEARING STATEMENT OF MURJO, STUMHOFFER AND WALKER

This prehearing statement is submitted by Clarence Stumhoffer, C. Daniel Walker, and Murjo Oil and Royalty, opposing parties, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Anadarko Petroleum Corporation

W. Thomas Kellahin
Kellahin and Kellahin
P. O. Box 2265
Santa Fe, NM 87504

OPPOSITION OR OTHER PARTY

ATTORNEY

C. W. Stumhoffer
P. O. Box 100416
Fort Worth, TX 76185-0416

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

C. Daniel Walker
6729 Grants Lane
Fort Worth, TX 76116

Murjo Oil & Royalty
P. O. Box 12666
Forth Worth, TX 76116

STATEMENT OF CASE

OPPOSITION OR OTHER PARTY

Applicant has applied to the Division for an order pooling all mineral interests in the Morrow formation underlying the W/2 of Sec. 22, T18S, R32E, N.M.P.M., Lea County, New Mexico forming a standard 320-acre spacing and proration unit for any and all formations and/or pools developed on 320-acre spacing within said vertical extent, and proposes to dedicate said pooled unit to its Querecho Plains Unit Well No. 1.

The above opposing parties disagree that Anadarko has made good faith efforts to obtain voluntary agreement, and will testify to that fact. Applicant has omitted pertinent facts concerning said well and concerning its terms of participation, to-wit:

1. That the well, as originally drilled, has produced more than 600,000 barrels of oil from the Strawn formation and has paid out.
2. That the Morrow formation was opened for production and such production was commingled, without authorization, with production from the Strawn formation.
3. That such production should have been applied to any costs of recompletion, and that production has been sufficient to fully pay such costs of recompletion.
4. Anadarko, therefore, did not acquire Stumhoffer's, Walker's and Murjo's share of the recompleted well bore and may not require reimbursement from them.
5. Anadarko, pursuant to §70-2-18B, NMSA, 1978, is liable to Stumhoffer, Walker and Murjo to account for and pay to them their proportionate share of production.

PROPOSED EVIDENCE

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
C. W. Stumhoffer, Petroleum Eng.	45 min.	3
Lee Thomas, Murjo Officer	45 min.	3

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 C. W. Stumhoffer, C. Daniel Walker, and Murjo Oil and Royalty

**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:

15 1991

APPLICATION OF ANADARKO PETROLEUM
CORPORATION FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.

CASE NO. ¹⁰⁹⁹⁶~~11096~~

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by ANADARKO PETROLEUM CORPORATION, as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

Anadarko Petroleum Corporation
P. O. Box 1330
Houston, Texas 77251-1330
Attn: Mr. Patrick Smith
(713) 876-8374

ATTORNEY

W. Thomas Kellahin
KELLAHIN AND KELLAHIN
P.O. Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285

OTHER PARTIES

Murjo Oil & Royalty
C. W. Stumhoffer
C. Daniel Walker

ATTORNEY

Ernest Carroll, Esq.
P. O. Drawer 239
Artesia, N.M. 87504
(505) 746-3505

STATEMENT OF CASE

Anadarko has acquired 100 % ownership of the wellbore now known as the Querecho Plains Unit Well No. 1. Anadarko has a 87.5 % of the working interest ownership in the oil and gas minerals in the Morrow formation underlying the W/2 of Section 22, T18S, R32E, NMPM, Lea County, New Mexico.

The Querecho Plains Unit Well No. 1 was originally drilled by Gary L. Bennett, as operator, to a total depth of 14,217 feet at a standard gas well location 1980 feet from the South and West lines (Unit K) of Section 22, then isolated by setting a packer at a depth of 12,400 feet and produced from the Strawn formation.

Anadarko has acquired ownership of the Querecho Plains Unit Well No. 1 and intends to recomplete it as a Morrow formation well capable of gas production.

Anadarko owns all of the working interest in the proposed spacing unit with the exception of the 40-acre tract consisting of the NE/4NW/4 (Unit C) which is subject to a federal lease NM-25457 with the operating rights below 11,746 feet held by other parties.

Anadarko has proposed the subject well and its spacing unit to all the parties who collectively own the remaining 12.5 % working interest of the spacing unit. Despite its good faith efforts, Anadarko has been unable to obtain a written voluntary agreement from any of these parties.

Anadarko Petroleum Corporation seeks to be named operator pursuant to a compulsory pooling order which makes provisions for each working interest owners to participate in any Morrow production by reimbursing the applicant for the value of the existing wellbore and the costs of recompleting, equipping and operating the well.

Pre-Hearing Statement
NMOCD Case 10996
Page 3

In the event a working interest owner fails to elect to participate, then provision be made to recover out of production, reimbursement to the applicant for the value of the existing wellbore and for the costs of the recompleting, equipping and operating the well, including a risk factor penalty of 200%.

Anadarko requests a provision for overhead rates of \$5,439 per month drilling and \$863 per month operating and a provision providing for an adjustment method of the overhead rates as provided by COPAS.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES	EST. TIME	EXHIBITS
Patrick Smith (landman)	20 min.	@ 8 exhibits
George Buehler (petroleum engineer)	20 Min.	@ 10 exhibits

PROCEDURAL MATTERS

KELLAHIN AND KELLAHIN



By: _____
W. Thomas Kellahin
P.O. Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285

LAW OFFICES

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

ERNEST L. CARROLL
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FAX TRANSMITTAL DATE: 6/3/94

PLEASE DELIVER THE FOLLOWING PAGE(S) TO:

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SENDER: Ernest L. Carroll

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10993
10996
11000
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LAW OFFICES

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ERNEST L. CARROLL
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MARY LYNN BOGLE

June 3, 1994

VIA FACSIMILE AND FIRST CLASS MAIL

Mr. William J. LeMay, Director
New Mexico Oil Conservation Division
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Santa Fe, New Mexico 87501

Re: Arco Permian Appl. for Compulsory Pooling,
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Very truly yours,

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



Ernest L. Carroll

ELC:kth
Encl.

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

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

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

Attorneys for C. W. Stumhoffer and
C. Daniel Walker