

JUN 20 1990

OIL CONSERVATION DIV. SANTA FE

## 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. 9973

APPLICATION OF MANZANO OIL CORPORATION FOR COMPULSORY POOLING AND AN UNORTHODOX GAS WELL LOCATION, LEA COUNTY, NEW MEXICO

#### PRE-HEARING STATEMENT

This pre-hearing statement is submitted by KELLAHIN, KELLAHIN & AUBREY as required by the Oil Conservation Division.

#### APPEARANCE OF PARTIES

APPLICANT (name, address, phone and contact person)

ATTORNEY

Manzano Oil Corporation W. Thomas Kellahin P.O. Box 2107 Roswell, NM 88202 Attn: Mr. Jim Ball (505) 623-1996

Kellahin, Kellahin & Aubrey P.O. Box 2265 Santa Fe, NM 87504 (505) 982-4285

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

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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.)

Manzano Oil Corporation plans to drill a 13,700 Morrow test called the Texaco Federal Com No. 2 well at an unorthodox location 1980 feet from the North line and 2310 feet from the East line of Section 14, T195, R33E. The well is 330 feet from the western boundary of the E/2 of the section.

Manzano has a portion of the rights in the E/2 as a result of a farmout from Texaco, but has been unable to obtain 100% voluntary commitment of all the working interest owners despite its efforts.

Because of the multiple potential of Morrow, Atoka gas and Wolfcamp oil and others, the location is closer to the west side of the spacing unit for geologic reasons.

#### 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)

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## PROPOSED EVIDENCE

## **APPLICANT**

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
Jim Ball (landman)	15 min.	Plat/AFE/ Correspondence
Marvin Gross or		Structure map
Dave Jordan (geologist)	20 min.	Isopach map
		Cross section
Donnie Brown (engineer)	15 min.	Production locator map Well cost allocation

#### OPPOSITION

WITNESSES EST. TIME EXHIBITS (name and expertise)

## PROCEDURAL MATTERS

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

None.

KELLAHIN, KELLAHIN & AUBREY

W. Thomas Kellahin

Post Office Box 2265

Santa Fe, New Mexico 87504

(505) 982-4285

# 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. 9973** 

APPLICATION OF MANZANO OIL CORPORATION FOR COMPULSORY POOLING AND AN UNORTHODOX GAS WELL LOCATION, LEA COUNTY, NEW MEXICO.

## PRE-HEARING STATEMENT

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

## APPEARANCES OF PARTIES

APPLICANT	ATTORNEY	
Manzano Oil Corporation		
Telephone:	Telephone:	
OPPOSITION OR OTHER PARTY	ATTORNEY	
Nearburg Producing Company	William F. Carr	
c/o Mark Nearburg	Campbell & Black, P.A	
401 E. Illinois, Suite 300	Post Office Box 2208	
Midland, Texas 79701	Santa Fe, New Mexico 87504	
(915) 686-8235	(505) 988-4421	
name, address, phone and	. ,	
contact person		



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## STATEMENT OF CASE

**APPLICANT** 

## 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.)

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## PROPOSED EVIDENCE

**APPLICANT** 

WITNESSES (Name and expertise)

EST. TIME

**EXHIBITS** 

**OPPOSITION** 

None

WITNESSES

EST. TIME

**EXHIBITS** 

(Name and expertise)

10 Min.

None

PROCEDURAL MATTERS

Signature

## **BEFORE THE**

#### OIL CONSERVATION DIVISION

## NEW MEXICO DEPARTMENT OF ENERGY, MINERALS

## AND NATURAL RESOURCES

RECEIVED

IN THE MATTER OF THE APPLICATION
OF MANZANO OIL CORPORATION FOR
COMPULSORY POOLING AND AN UNORTHODOX
GAS WELL LOCATION,
LEA COUNTY, NEW MEXICO.

JUL 17 1990
OIL CONSERVATION DIV.
SANTA FE

CASE NO. 9973

## **ENTRY OF APPEARANCE**

COMES NOW CAMPBELL & BLACK, P.A., and hereby enters its appearance in the above referenced case on behalf of Nearburg Producing Company and Karl A. Schellinger.

Respectfully submitted,

CAMPBELL & BLACK, P.A.

WILLIAM F. CARR

Post Office Box 2208

Santa Fe, New Mexico 87504

Telephone: (505) 988-4421

ATTORNEYS FOR NEARBURG PRODUCING COMPANY AND KARL A. SCHELLINGER