

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. 9994

APPLICATION OF

RECEIVED

JUN 22 1990

OIL CONSERVATION DIVISION

PRE-HEARING STATEMENT

This prehearing statement is submitted by Doyle Hartman, Oil Operator  
as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Doyle Hartman, Oil Operator

500 North Main

Midland, Texas 79701

(915) 684-4011

Attn: Bryan Jones, Landman

name, address, phone and  
contact person

OPPOSITION OR OTHER PARTY

Chevron U.S.A., Inc.

1923 Dal Paso

Hobbs, New Mexico 88240

Mr. R.C. Anderson

name, address, phone and  
contact person

ATTORNEY

J.E. Gallegos

Gallegos Law Firm

141 East Palace Avenue

Santa Fe, New Mexico 87501

ATTORNEY

William F. Carr, Esq.

Campbell & Black

110 N. Guadalupe

Santa Fe, New Mexico 87501

(505) 988-4421

STATEMENT OF CASE

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.) See Attached Page 2a.

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.)

Doyle Hartman seeks approval of a 280-acre non-standard proration unit for the Eumont Gas Pool consisting of the N/2 SE/4 and the SE/4 SE/4 of Section 5 and the NE/4 of Section 8, Township 21 South, Range 36 East, Lea County, New Mexico. Hartman also seeks to compulsorily pool all mineral interests therein and dedicate them to his existing State "A" Com. Well No. 4 (formerly the Texaco State "A" Well No. 4) located in Unit A of Section 8 and a new infill well, the State "A" Com. Well No. 5 to be drilled within the SE/4 of Section 5. Hartman seeks the appropriate reduction of the adjacent non-standard Eumont gas proration unit operated by ARCO Oil & Gas which has agreed to the reduction of their adjacent unit. The relief sought by Hartman is necessary to prevent waste and protect the correlative rights of all owners, including the owners of interests within the N/2 SE/4 of Section 5 which is presently undeveloped and undedicated as to the Eumont Gas Pool and has been and continues to be <sup>drained</sup>~~divided~~ from adjacent Eumont gas proration units.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Bryan Jones, Landman	approx. 30 minutes	Yes - approximately 10
Mike Steward <sup>†</sup> , Engineer	approx. 30 minutes	Yes - approximately 10
Dan Nutter, Engineer	approx. 30 minutes	Yes - approximately 5

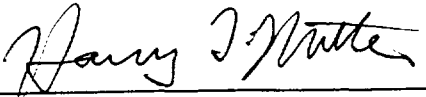
OPPOSITION

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 the hearing)

As of the date hereof, Hartman has submitted a Request for Issuance of Subpoena requiring Chevron to produce all records concerning the formation by Chevron, either individually or with other producers, of any Eumont proration units within Sections 4, 5, 6, 8 and 9, Township 21 South, Range 36 East, Lea County, New Mexico.

  
\_\_\_\_\_  
Signature

**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:

APPLICATION OF DOYLE HARTMAN FOR  
COMPULSORY POOLING, A NON-STANDARD  
GAS PRORATION UNIT AND  
SIMULTANEOUS DEDICATION,  
LEA COUNTY, NEW MEXICO.

CASE NO. 9994

RECEIVED

JUN 29 1994

OIL CONSERVATION DIVISION

**PRE-HEARING STATEMENT**

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

**APPEARANCES OF PARTIES**

**APPLICANT**

Doyle Hartman \_\_\_\_\_  
Oil Operator \_\_\_\_\_  
Post Office Box 10426 \_\_\_\_\_  
Midland, Texas 79702 \_\_\_\_\_  
Telephone: \_\_\_\_\_

**ATTORNEY**

Gene Gallegos \_\_\_\_\_  
Harry Nutter \_\_\_\_\_  
141 E. Palace Avenue \_\_\_\_\_  
Santa Fe, New Mexico 87501 \_\_\_\_\_  
Telephone: (505) 983-6686 \_\_\_\_\_

**OPPOSITION OR OTHER PARTY**

Chevron USA, Inc. \_\_\_\_\_  
c/o Alan Bohling \_\_\_\_\_  
Post Office Box 670 \_\_\_\_\_  
Hobbs, New Mexico 88240 \_\_\_\_\_  
(505) 393-4121 \_\_\_\_\_  
name, address, phone and  
contact person

**ATTORNEY**

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

**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.)

Chevron opposes the creation of either a 320-acre or a 280-acre non standard unit for the acreage Mr. Hartman proposes to dedicate to his proposed well. This acreage is currently dedicated in the Eumont Gas Pool and creation of either proposed unit will dilute Chevron's interest in the existing well in the NE/4 of Section 8 thereby impairing its correlative rights. The proposal is unnecessary for the prudent development of this acreage.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES  
(Name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES  
(Name and expertise)

EST. TIME

EXHIBITS

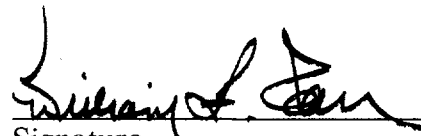
Bryan Cotner (Reservoir Engineer)

30 Min.

Approximately 5

**PROCEDURAL MATTERS**

None

  
Signature