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

RECEIVED

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

JUN 1990 OLGONOSTATION OMEGON

CASE NO. 94960

APPLICATION OF BIRD CREEK RESOURCES, INC. FOR COMPULSORY POOLING, EDDY 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

Lawrence W. Robinette Bird Creek Resources, Inc. 1412 S. Boston, Suite 550 Tulsa, Oklahoma 74119

(918) 582-4242

W. Thomas Kellahin Kellahin, Kellahin Aubrey P.O. Box 2265 Santa Fe, New Mexico 87504

(505) 982-4285

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.)

Requests order pooling all mineral interests from the surface to the bottom of the Delaware formation, East Loving Delaware Pool, or 6,300 feet, whichever is deeper, underlying the NW/4NE/4 Section 15, T23S, R28E, N.M.P.M., Eddy County, New Mexico.

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
Lawrence W. Robinette, Petroleum Landman	15 minutes	3
D.G. Campbell, Petroleum Geologist	15 minutes	3
OPPOSITION		

WITNESSES EST. TIME EXHIBITS (name and expertise)

PROCEDURAL MATTERS

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

KELLAHIN, KELLAHIN & AUBREY

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