



**MONTGOMERY
& ANDREWS**
LAW FIRM

J. SCOTT HALL

Office: (505) 986-2646

Email: shall@montand.com

Reply To: Santa Fe Office

www.montand.com

RECEIVED OCD

2012 MAR 22 P 3:57

March 22, 2012

Ms. Jami Bailey, Director
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87501

Hand-Delivered

**Re: NMOCD Case No. 14804: Application of Nadel and Gussman Permian
for Approval of a Four 160-Acre Horizontal Wellbore Project, Eddy
County, New Mexico**

Dear Ms. Bailey:

On behalf of Nearburg Producing Company, enclosed for filing is an original and one copy of a Pre-Hearing Statement in the above case.

Very truly yours,

Karen Williams
Assistant to J. Scott Hall

:kw
Enclosures

360001

REPLY TO:

325 Paseo de Peralta
Santa Fe, New Mexico 87501
Telephone (505) 982-3873 • Fax (505) 982-4289

Post Office Box 2307
Santa Fe, New Mexico 87504-2307

6301 Indian School Road NE, Suite 400
Albuquerque, New Mexico 87110
Telephone (505) 884-4200 • Fax (505) 888-8929

Post Office Box 36210
Albuquerque, New Mexico 87176-6210

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

RECEIVED OCD
2012 MAR 22 P 3: 57

**APPLICATION OF NADEL AND GUSSMAN
PERMIAN FOR APPROVAL OF FOUR 160-
ACRE HORIZONTAL WELLBORE PROJECT
AREAS, EDDY COUNTY, NEW MEXICO**

CASE NO. 14804

PRE-HEARING STATEMENT

Nearburg Producing Co. ("Nearburg") provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

Nadel and Gussman Permian

APPLICANT'S ATTORNEY

James Bruce, Esq.
P.O. Box 1056
Santa Fe, NM 87504
(505) 982-2043

OTHER PARTY

Nearburg Producing Company

OTHER PARTY'S ATTORNEY

J. Scott Hall
Montgomery & Andrews
P.O. Box 2307
Santa Fe, NM 87504-2307
(505) 982-3873

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order for approval of four non-standard horizontal wellbores project areas, each consisting of 160-acre, more or less, to be dedicated to any production from the Yeso Formation to be configured as follows:

- (1) Lawman 1-H (API #30-015-39874) consisting of the W/2SW/4 of Sec 12 and the W/2NW/4 of Sec 13, T19S, R25E,
- (2) Lawman 2-H (API #30-015-39875) consisting of the E/2SW/4 of Sec 12 and the E/2NW/4 of Sec 13, T19S, R25E,
- (3) Lawman 3-H (API #30-015-39876) consisting of the W/2SE/4 of Sec 12 and the W/2NE/4 of Sec 13, T19S, R25E,
- (4) Lawman 4-H (API #30-015-39877) consisting of the E/2SE/4 of Sec 12 and the E/2NE/4 of Sec 13, T19S, R25E,

OTHER PARTY

Nearburg Producing Company is the owner of oil and gas leasehold working interests located in the vicinity of the lands that are the subject of Nadel and Gussman Permian's Application.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

Nearburg does not at this time plan to present witnesses at the hearing on the Application, but reserves the right to do so.

PROCEDURAL MATTERS

None.

Montgomery and Andrews, P. A.

By: J. Scott Hall

J. Scott Hall
Post Office Box 2307
Santa Fe, New Mexico 87504-2307
(505) 982-3873
(505) 982-4289 fax
shall@montand.com
Attorneys for Nearburg Producing Company

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served to counsel of record by electronic mail this 22 day of March, 2012.

James Bruce, Esq.
P.O. Box 1056
Santa Fe, NM 87504
jamesbruc@aol.com

J. Scott Hall
J. Scott Hall