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November 7, 2005

Florene Davidson
Hearing Clerk
Oil Conservation Division
1220 So. St. Francis Drive
Santa Fe, NM 87505

RE: Lynx Petroleum Consultants, Inc. Application for Compulsory Pooling

Dear Ms. Davidson:

Attached please find the Applicant Lynx Petroleum, Inc.'s Pre-Hearing Statement. This matter is set for the November 17, 2005 docket.

Thank you for your courtesies.

Sincerely,
DOMENICI LAW FIRM, P.C.



Charles N. Lakins, Esq.

cc: Client
1606

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OIL CONSERVATION
DIVISION

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

**APPLICATION OF LYNX PETROLEUM
CONSULTANTS, INC. FOR COMPULSORY
POOLING, LEA COUNTY, NEW MEXICO**

Case No.: 13578

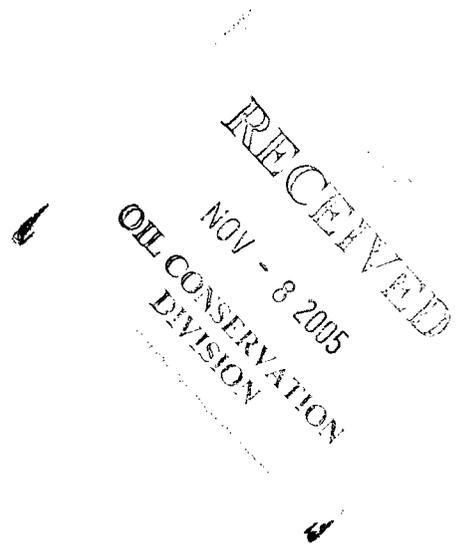
APPLICANT'S PRE-HEARING STATEMENT

COMES NOW Lynx Petroleum Consultants, Inc., by and through undersigned counsel of record, and submits the following Pre-Hearing Statement in the above-captioned matter

I. Name of the Party and Party's Attorney

Lynx Petroleum Consultants, Inc.
Operator of Record
PO Box 1708
Hobbs, NM 88241

Pete V. Domenici, Jr., Esq.
Charles N. Lakins, Esq.
Attorneys for Lynx Petroleum Consultants, Inc.
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II. Lynx Petroleum Consultants, Inc's Statement of the Case

Lynx Petroleum Consultants, Inc. (Lynx) is applying for an order pooling all mineral interests from the surface to the base of the Wolfcamp formation underlying a standard 40-acre proration unit being the NE1/4 NE1/4 of Section 8, Township 18S, Range 32E, N.M.P.M., Lea County, New Mexico.

Lynx will provide testimony that it is an interest owner in the subject acreage and that it has the right to re-enter and attempt a completion of the plugged and abandoned Amoco Production Company Federal 'DM' No. 1 located thereon. A map showing the proposed location and surrounding producing wells will be presented at hearing.

Lynx will testify that there is only one other mineral interest owner in the NE1/4 NE1/4 of Section 8, T18S, R32E, which is XTO Energy, 810 Houston Street, Fort Worth, TX 76102-6298. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the subject acreage both through written correspondence and verbally via telephone. Copies of the correspondence will be presented at hearing. Over the course of these

communications, several copies of an Authority for Expenditure were prepared and submitted to the other mineral interest owners for review and approval. The latest iteration of the AFE will also be presented at hearing.

Overhead charges will be requested conforming to the Ernst & Young Fixed-Rate Overhead Survey for 2004 adjusted for well depth and the 2005 escalation factor.

Lynx will testify to its belief that the granting of the compulsory pooling order will prevent the drilling of unnecessary wells, prevent waste of hydrocarbon resources, and protect correlative rights.

OPERATOR'S PROPOSED EVIDENCE

Witness:

Jack Scott, Owner-Partner
Lynx Petroleum Consultants, Inc.
Operator of Record
PO Box 1708
Hobbs, NM 88241

Estimated Time: 30 minutes.

Respectfully Submitted,



Charles N. Lakins Esq.
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