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**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 EDGE PETROLEUM OPERATING
COMPANY, INC. TO EXPAND THE HORIZONTAL
LIMITS OF THE LOVINGTON-UPPER PENNSYLVANIAN
POOL, OR IN THE ALTERNATIVE FOR APPROVAL OF A
NON-STANDARD OIL SPACING AND PRORATION UNIT
AND AN UNORTHODOX OIL WELL LOCATION IN THE
NORTHEAST LOVINGTON-UPPER PENNSYLVANIAN
POOL, LEA COUNTY, NEW MEXICO.**

Case No. 14,259

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Edge Petroleum Operating Company, Inc.
Suite 2000
1301 Travis
Houston, Texas 77002

Attention: William Michalak

APPLICANT'S ATTORNEY

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

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order expanding the horizontal limits of the Lovington-Upper Pennsylvanian Pool, which is developed on statewide spacing rules, to include the NW¼ of Section 25, Township 16 South, Range 36 East, N.M.P.M., and the formation of a standard 40 acre oil spacing and proration unit comprised of the SW¼NW¼ of Section 25, to be dedicated to the

South Lovington 25 Well No. 1, located at an orthodox oil well location 1977 feet from the north line and 330 feet from the west line of Section 25. In the alternative, applicant requests approval of a non-standard 40 acre oil spacing and proration unit in the Northeast Lovington-Upper Pennsylvanian Pool, which is spaced on 80 acres under Order No. R-3816, comprised of the SW/4NW/4 of Section 25. The non-standard unit will be dedicated to the South Lovington 25 Well No. 1, located at an unorthodox oil well location in said pool. Applicant also requests approval of the unorthodox location.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Wm. Michalak (landman)	20 min.	Approx. 10
Howard Creasey (geophysicist)	20 min.	Approx. 5

OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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PROCEDURAL MATTERS

Respectfully submitted,



James Bruce
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 Santa Fe, New Mexico 87504
 (505) 982-2043

Attorney for Edge Petroleum Operating Company, Inc.