

**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 NGX COMPANY FOR  
COMPULSORY POOLING AND A NON-  
STANDARD GAS SPACING AND PRORATION  
UNIT, EDDY COUNTY, NEW MEXICO.**

No. 13,034

**PRE-HEARING STATEMENT**

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

**APPEARANCES**

**APPLICANT**

NGX Company  
P.O. Box 5  
Roswell, New Mexico 88202  
(505) 622-0321

**APPLICANT'S ATTORNEY**

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attention: James L. Schultz

**OPPONENT**

Marbob Energy Corporation

**OPPONENT'S ATTORNEY**

William F. Carr

**STATEMENT OF THE CASE**

**APPLICANT**

Applicant seeks an order pooling all mineral interests from the surface to the base of the Morrow formation underlying the SE¼ of Section 21, Township 22 South, Range 27 East, NMPM, to form a non-standard 160-acre gas spacing and proration unit for any formations and/or pools developed on 320-acre spacing within that vertical extent. The unit is to be dedicated to the Boggs Fee Well No. 1, located in the NE¼SE¼ of Section 21, which is to be re-entered and re-completed. Also to be considered will be the cost of re-entering and re-completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a charge for the risk involved in re-entering and working over the well.

**OPPONENT**

**PROPOSED EVIDENCE**

**APPLICANT**

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
G. L. Scott JTT (geologist)	25 min.	Approx. 8

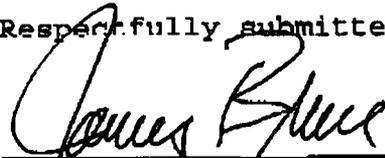
**OPPONENT**

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

**PROCEDURAL MATTERS**

-None-

Respectfully submitted,




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James Bruce  
 Post Office Box 1056  
 Santa Fe, New Mexico 87504  
 (505) 982 2043

Attorney for Nadel and Gussman  
Permian, L.L.C.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record via facsimile transmission this 23<sup>rd</sup> day of March, 2003:

William F. Carr  
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James Bruce

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