



**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:**

**CASE NO. 11218**

**APPLICATION OF NAUMANN OIL & GAS, INC.  
FOR COMPULSORY POOLING AND AN UNORTHODOX  
GAS WELL LOCATION, EDDY COUNTY, NEW MEXICO.**

**PRE-HEARING STATEMENT**

**This pre-hearing statement is submitted by NAUMANN OIL & GAS,  
INC., as required by the Oil Conservation Division.**

**APPEARANCE OF PARTIES**

**APPLICANT**

Naumann Oil & Gas, Inc.  
c/o Logro Corp.  
P. O. Box 261324  
Plano, Texas 75026-1324  
attn: David N. Frye  
(214) 964-0608

**ATTORNEY**

W. Thomas Kellahin  
KELLAHIN AND KELLAHIN  
P.O. Box 2265  
Santa Fe, NM 87504  
(505) 982-4285

**OTHER PARTIES**

S. P. Yates

**ATTORNEY**

William F. Carr, Esq.  
P. O. Box 2208  
Santa Fe, New Mexico 87504  
(505) 9884421

**STATEMENT OF CASE**

APPLICANT

Naumann has a working interest ownership in the oil and gas minerals underlying the S/2 of Section 34, T17S, R29E, NMPM, Eddy County, New Mexico.

Naumann has proposed the drilling of the Cooper Well No. 1 to all interest owners in the proposed spacing unit and invited each interest owner to participate on a voluntary basis by each paying his/her proportionate share of the drilling and completing said well as a Morrow gas well.

All of the appropriate working interest ownership of the oil & gas minerals underlying S/2 of said Section 34 have voluntarily agreed to the formation of this spacing unit and to participation in this well except for S. P. Yates.

Pursuant to Section 70-2-17(c) NMSA (1978) and in order to obtain its just and equitable share of potential production underlying this spacing unit, Naumann needs an order of the Division pooling the mineral interests involved in order to protect correlative rights and prevent waste.

That the proposed unorthodox gas well location is necessary in order to penetrate a Morrow channel sand at its optimum location within the S/2 of Said Section 34.

**PROPOSED EVIDENCE**

APPLICANT:

WITNESSES		EST. TIME	EXHIBITS
David N. Frye	(landman)	15 min.	3 exhibits
Jack Naumann	(geologist)	20 Min.	4 exhibits

**PROCEDURAL MATTERS**

None applicable at this time.

~~KELLAHIN AND KELLAHIN~~

By: 

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