

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:

**RECEIVED**

JUN \_ 9 1995

Oil Conservation Division

APPLICATION OF ANSON GAS CORPORATION  
FOR DIRECTIONAL DRILLING AND AN  
UNORTHODOX OIL WELL LOCATION,  
LEA COUNTY, NEW MEXICO.

CASE NO. 11309

**PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Campbell, Carr & Berge, P.A., as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

APPLICANT

AnSon Gas Corporation  
c/o Charles E. Lundeen  
3814 North Santa Fe  
Oklahoma City, OK  
(405) 528-0525

name, address, phone and  
contact person

ATTORNEY

William F. Carr, Esq.  
Campbell, Carr & Berge, P.A.  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421

OTHER PARTY

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\_\_\_\_\_  
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name, address, phone and  
contact person

ATTORNEY

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**STATEMENT OF CASE**

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

AnSon Gas Corporation, applicant in the above-styled cause, seeks authority to re-enter the plugged and abandoned Nearburg Byers "12L" Well No. 1 located 1980 feet from the South line and 810 feet from the West line (Unit L) of Section 12, Township 17 South, Range 37 East, wherein the applicant proposes to directionally drill the subject well in a southeasterly direction to an unorthodox bottomhole location within 50 feet of a point 1650 feet from the South line and 900 feet from the West line of Section 12 to test the Strawn formation, South Humble City-Strawn Pool. The N/2 SW/4 of Section 12 is to be dedicated to the well forming a standard 80-acre oil spacing and proration unit.

OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

**PROPOSED EVIDENCE**

APPLICANT

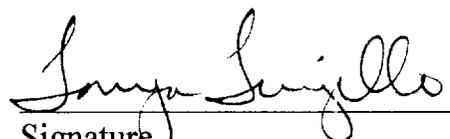
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Al Swanson, Landman	15 Min.	Approximately 8
Hal E. Hawthorne, Geologist	10 Min.	Approximately 4

OTHER PARTY

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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**PROCEDURAL MATTERS**

(Please identify any procedural matters which need to be resolved prior to hearing)

  
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Signature