

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

**RECEIVED**

JUL 7 1995

Oil Conservation Division

IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
DIVISION FOR THE PURPOSE OF  
CONSIDERING:

APPLICATION OF BASS ENTERPRISES  
PRODUCTION CO. FOR COMPULSORY  
POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 11336

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by BASS ENTERPRISES  
PRODUCTION CO., as required by the Oil Conservation Division.

**APPEARANCE OF PARTIES**

**APPLICANT**

Bass Enterprises Production Co.  
201 Main Street  
Fort Worth, Texas 76102  
(817) 390-8400  
attn: Wayne Bailey

**ATTORNEY**

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

**STATEMENT OF CASE**

Bass Enterprises Production Co., ("Bass") has a working interest ownership in the oil and gas minerals from the surface to the base of the Morrow formation underlying the E/2 of Section 2, T19S, R28E, NMPM, Eddy County, New Mexico.

E/2 of Section 2, T19S, R28E, Eddy County, New Mexico, is divided such that any production from formations below the top of the Wolfcamp to the base of the Morrow in the E/2 is owned among Bass Enterprises Production Co. ("Bass"), Amoco Production Company and Santa Fe Energy Resources, Inc.

Bass has proposed the subject well and its spacing unit to the remaining interest owners. Despite its good faith efforts, Bass has been unable to obtain a written voluntary agreement from all of those owners.

**PROPOSED EVIDENCE**

<u>APPLICANT:</u> WITNESSES	EST. TIME	EXHIBITS
Worth Carlin (landman)	15-20 Min.	@ 6 exhibits
Michael Cervantes (geologist)	15-20 Min.	@ 3 exhibits

**PROCEDURAL MATTERS**

KELLAHIN AND KELLAHIN

By:   
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