

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

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Oil Conservation Division

IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
DIVISION FOR THE PURPOSE OF  
CONSIDERING: APPLICATION OF  
ENSERCH EXPLORATION, INC. FOR  
COMPULSORY POOLING, LEA COUNTY,  
NEW MEXICO

CASE NO. 11473

PRE-HEARING STATEMENT

This prehearing statement is submitted by Enserch Exploration, Inc. as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Enserch Exploration, Inc.  
c/o Jerry Anderson  
4849 Greenville Ave. #1200  
Dallas, Texas 75206  
(214) 692-9426

ATTORNEY

J. Scott Hall, Esq.  
Miller, Stratvert, Torgerson & Schlenker  
P.O. Box 1986  
Santa Fe, NM 87504-1986  
(505) 989-9614

OPPOSITION OR OTHER PARTY

None is known to applicant

ATTORNEY

STATEMENT OF CASE

APPLICANT

Applicant seeks to pool unjoined working interests and unleased mineral interests from the surface to the base of the Delaware formation preparatory to the drilling of its Moberly 21 Well No. 1 to be drilled at a standard location 1980 FNL and 1980 FEL (Unit

G), Sec. 21, T-25-S, R-36-E NMPM in Lea County. Applicant also seeks to be designated operator of the well and seeks allocation of costs and charges, including a charge for the risk involved in drilling the well.

OPPOSITION OR OTHER PARTY

N/A

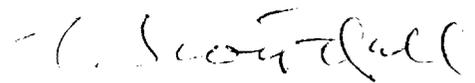
<u>APPLICANT</u>	PROPOSED EVIDENCE	
Witnesses	Est. Time	Exhibits
Jerry Anderson Landman	30 min.	4: land and ownership Exhibits; JOA/AFE and joinder letters.
Ralph Nelson Geologist	20 min	2: Isopach & Structure Maps

OPPOSITION

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 the hearing)

None



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Signature