

**JAMES BRUCE**  
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SANTA FE, NEW MEXICO 87504

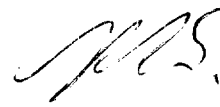
SUITE B  
612 OLD SANTA FE TRAIL  
SANTA FE, NEW MEXICO 87501

(505) 982-2043  
(505) 982-2151 (FAX)

February 4, 1997

**Hand Delivered**

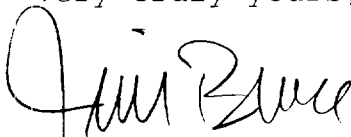
Florene Davidson  
New Mexico Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505



Dear Florene:

Enclosed are an original and two copies of a Pre-Hearing Statement in Case 11715, filed on behalf of Santa Fe Energy Resources, Inc.

Very truly yours,



James Bruce

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 SANTA FE ENERGY  
RESOURCES, INC. FOR COMPULSORY,  
POOLING, LEA COUNTY, NEW MEXICO

CASE NO. 11715

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Santa Fe Energy  
Resources, Inc.  
Suite 1330  
550 West Texas  
Midland, Texas 79701  
(505) 686-6736  
Attn: Joe W. Hammond

APPLICANT'S ATTORNEY

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks to drill a well in the S½ §29-22S-34E, at a standard location in the SW¼, to a depth sufficient to test the Morrow formation. Applicant seeks to pool all formations spaced on 320 acres. There are two interest owners who have not agreed to join in Santa Fe's proposed well.

OPPONENT

**PROPOSED EVIDENCE**

APPLICANT

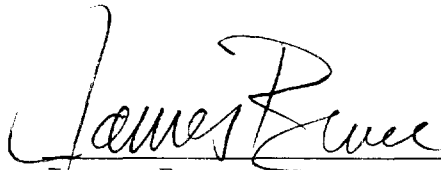
<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Joe W. Hammond (landman)	10 min.	(a) land plat (b) correspondence (c) AFE (d) notice affidavit
Tom Tinney (geologist)	10 min.	(a) structure map (b) isopach (c) cross-section

OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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**PROCEDURAL MATTERS**

-None-



James Bruce  
P.O. Box 1056  
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(505) 982-2043

Attorneys for Santa Fe Energy  
Resources, Inc.