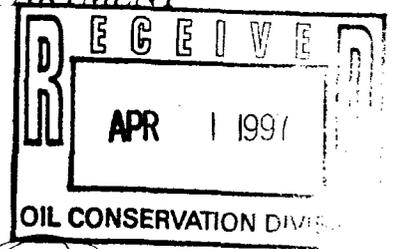


STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF  
BASS ENTERPRISES PRODUCTION CO. AND  
SANTA FE ENERGY COMPANY FOR  
RESCISSION OF ORDER NO. NSL-3745,  
EDDY COUNTY, NEW MEXICO.



CASE 11713

IN THE MATTER OF THE APPLICATION OF  
BASS ENTERPRISES PRODUCTION CO. TO  
DRILL AND FOR SIMULTANEOUS DEDICATION  
OR, IN THE ALTERNATIVE, SIMULTANEOUS  
DEDICATION AND FOR UNORTHODOX  
GAS WELL LOCATION,  
EDDY COUNTY, NEW MEXICO.

CASE 11758

**PRE-HEARING STATEMENT**

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

**APPEARANCES OF PARTIES**

**APPLICANT**

Bass Enterprises Production Co.  
and Santa Fe Energy Co.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**ATTORNEY**

Ernest L. Carroll, Esq.  
James E. Haas, Esq.  
Losee, Carson, Haas & Carroll  
P.O. Box 1720  
Artesia, NM 88211-1720  
(505) 746-3505

**OTHER PARTY**

Mewbourne Oil Company  
c/o Steve Cobb  
500 West Texas, Suite 1050  
Midland, TX 79701  
(915) 682-3715

**ATTORNEY**

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

name, address, phone and  
contact person

**STATEMENT OF CASE**

APPLICANT

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

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.)

Mewbourne Oil Company, will present testimony in opposition to the simultaneous dedication of wells in Section 2, Township 19 South, Range 28 East.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES  
(Name and expertise)

EST. TIME

EXHIBITS

OTHER PARTY

WITNESSES  
(Name and expertise)

EST. TIME

EXHIBITS

Ralph Moore, Geologist

5 Min.

Approximately 3

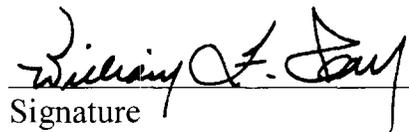
Bryan Montgomery,  
Reservoir Engineer

20 Min.

Approximately 3

**PROCEDURAL MATTERS**

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

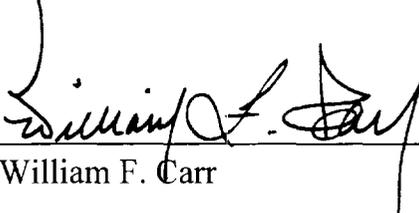
  
Signature

**Pre-hearing Statement**  
**NMOCD Case Nos. 11713; 11758**  
**Page 4**

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused a true and correct copy of the foregoing Pre-Hearing Statement to be telecopied and mailed this 1<sup>st</sup> day of April, 1997 to the following counsel of record:

Ernest L. Carroll, Esq.  
James E. Haas, Esq.  
Losee, Carson, Haas & Carroll  
P.O. Box 1720  
Artesia, NM 88211-1720  
(505) 746-6316

  
\_\_\_\_\_  
William F. Carr