

**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 EOG RESOURCES, INC.  
FOR POOL CREATION, SPECIAL POOL  
RULES AND A DISCOVERY ALLOWABLE,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 12649**

OIL CONSERVATION DIV.  
01 APR 30 PM 5:26

**PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Holland & Hart LLP and Campbell & Carr, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

EOG Resources, Inc.  
Attn: Patrick Tower  
P.O. Box 2267  
Midland, Texas 79702  
(915) 686-3776

**ATTORNEY**

William F. Carr, Esq.  
Holland & Hart LLP and Campbell & Carr  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421

**STATEMENT OF CASE**

APPLICANT

Application of EOG Resources, Inc. for pool creation, special pool rules, and a discovery allowable, Eddy County, New Mexico. Applicant seeks the creation of a new pool in the Strawn formation as the result of the discovery of hydrocarbons in its Oak Lake "25" Federal Well No. 1 located 850 feet from the North line and 750 feet from the West line of Section 25, Township 17 South, Range 30 East, NMPM, including provisions for 160-acre oil well spacing, special well location requirements, a gas-oil ratio of 4,000 cubic feet of gas for each barrel of oil produced, and a special depth bracket allowable of 1,120 barrels of oil per day for the pool. EOG is also seeking approval of a discovery allowable for this well. The proposed pool is centered approximately 3 miles East of Loco Hills, New Mexico.

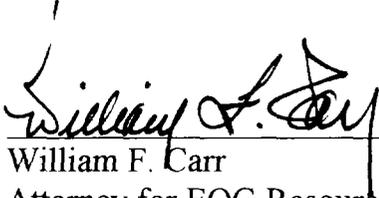
**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Patrick Tower (Land)	10 Minutes	Approx. 3
Jeff Seibens (Geology and Geophysics)	15 Minutes	Approx. 3
Randy Cate (Petroleum Engineering)	20 Minutes	Approx. 5

**PROCEDURAL MATTERS**

EOG Resources, Inc. has none at this time.

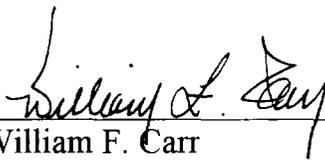
  
 \_\_\_\_\_  
 William F. Carr  
 Attorney for EOG Resources, Inc.

## CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of April, 2001, I have caused to be fax-delivered a copy of our Pre-Hearing Statement in the above-captioned case to the following named parties:

James Bruce, Esq.  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043  
(505) 982-2151

W. D. Masterson  
Kilgore & Kilgore, PLLC  
Attorneys for Jack D. Knox  
3131 McKinney Avenue  
Suite 700 - LB 103  
Dallas, Texas 75204  
(214) 969-9099  
(214) 953-0133 (Fax)

  
\_\_\_\_\_  
William F. Carr  
Attorney for EOG Resources, Inc.

**KILGORE & KILGORE**

LAWYERS

3131 MCKINNEY AVENUE

Suite 700 - LB 103

DALLAS, TEXAS 75204-2471

April 26, 2001

(214) 969-9099  
FAX: (214) 953-0133  
FAX: (214) 953-0242

APR 27 2001

**VIA FEDERAL EXPRESS**  
**TRACKING NO. 8255 5900 4875**

The New Mexico Oil Conversation Division  
Department of Energy, Minerals and Natural Resources  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Attention: Legal Division

Re: *In the Matter of the Application of EOG Resources, Inc. for Pool Creation,  
Special Pools Rules, and a Discovery Allowable Eddy County, New Mexico;*  
Case No. 12649.

Gentlemen:

Transmitted herewith are four (4) copies of a Pre-Hearing Statement of Jack D. Knox for filing in the captioned proceedings.

Please return a file-stamped copy in the enclosed FedEx Envelope (Tracking No. 8255 5900 4886).

Please place us on the service list and provide us with copies of all filings.

Yours very truly,

  
W. D. Masterson

WDM/bt  
Encl.

cc: Mr. William F. Carr  
Mr. Jack D. Knox

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

<b>IN THE MATTER OF THE APPLICATION</b>	§	
<b>OF EOG RESOURCES, INC. FOR POOL</b>	§	
<b>CREATION, SPECIAL POOLS RULES,</b>	§	<b>CASE NO. 12649</b>
<b>AND A DISCOVERY ALLOWABLE</b>	§	
<b>EDDY COUNTY, NEW MEXICO</b>	§	

01 APR 27 PM 3:33  
OIL CONSERVATION DIV

**PRE-HEARING STATEMENT OF JACK D. KNOX**

NOW COMES Jack D. Knox, appearing through counsel and files this his pre-hearing statement pursuant to Division Rule 1208.B and in support thereof would show the Court as follows:

**I.**

Mr. Knox desires to be represented by his attorney, Mr. W. D. Masterson.

**II.**

**STATEMENT OF THE CASE**

Mr Knox desires to have his interests represented at the hearing scheduled to commence on May 3, 2001, and to have the ability to cross examine witnesses offered in support of the requested pooling and other matters.

**III.**

**WITNESS LIST**

Mr. Knox does not currently plan to call any witnesses of his own, but may cross examine other witnesses that testify in support of the requested pooling and allowables.

IV.

**TIME ESTIMATE**

Mr. Knox estimates it will take several hours to present his case.

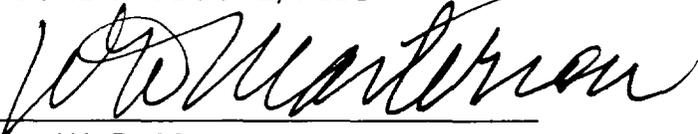
V.

**PROCEDURAL MATTERS REQUIRING RESOLUTION**

Mr. Knox has not identified any procedural matter requiring resolution prior to the hearing.

Respectfully submitted,

KILGORE & KILGORE, PLLC

By 

W. D. Masterson  
SBN 13184000

3131 McKinney Avenue  
Suite 700 - LB 103  
Dallas, Texas 75204  
(214) 969-9099 - Telephone  
(214) 953-0133 - Fax

ATTORNEYS FOR JACK D. KNOX

**CERTIFICATE OF SERVICE**

This is to certify that on the 26th day of April, 2001, a true and correct copy of the foregoing document has been forwarded to the following counsel of record via facsimile:

**FAX NO. 505/983-6043**

William F. Carr  
HOLLAND & HART, LLP  
AND  
CAMPBELL & CARR  
P. O. Box 2208  
Sante Fe, New Mexico 87504-2208

A handwritten signature in black ink, appearing to read "W. D. Masterson", written over a horizontal line.

W. D. Masterson