

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

RECEIVED

JUN 27 1991

OIL CONSERVATION DIVISION

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

Case No: 10,336

APPLICATION OF GRACE PETROLEUM
CORPORATION FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Grace Petroleum Corporation
Broadway Executive Park
6501 North Broadway
Oklahoma City, OK 73116
(405) 840-6836
Attention: Randy Upchurch

James Bruce
Hinkle, Cox, Eaton,
Coffield & Hensley
500 Marquette, N.W.
Suite 800
Albuquerque, N.M. 87102
(505) 768-1500

OPPOSITION OR OTHER PARTY

ATTORNEY

STATEMENT OF CASE

APPLICANT

An interest owner refuses to commit its interest to the
proposed well. Therefore, Applicant seeks to force pool
this interest, be named well operator, and have a penalty
assessed against the non-consenting interest owner.

OPPOSITION OR OTHER PARTY

PROPOSED EVIDENCE

APPLICANT

WITNESS	EST. TIME	EXHIBITS
Randy Upchurch (Landman)	10 minutes	(a) Land Plat (b) Correspondence (c) AFE (d) Notice letter
Ed Dirhberg (Geologist)	10 minutes	(a) Isopach/ structure map/ cross-section

OPPOSITION

WITNESS	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

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

Respectfully Submitted,

HINKLE, COX, EATON, COFFIELD &
HENSLEY

By 

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