

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:

RECEIVED

JUN 22 1990

OIL CONSERVATION DIVISION

APPLICATION OF MESA OPERATING  
LIMITED PARTNERSHIP FOR COMPULSORY POOLING,  
SAN JUAN COUNTY, NEW MEXICO.

CASE NOS. 9980, 9981, 9982,  
9983, 9984, 9985,  
9986, 9987, 9988,  
9989, 9990, 9991,  
9992 and 9993

PRE-HEARING STATEMENT

This prehearing statement is submitted by William F. Carr, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Mesa Operating Limited Partnership  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Telephone: \_\_\_\_\_

**ATTORNEY**

J. Scott Hall \_\_\_\_\_  
Miller, Stratvert, Torgerson & \_\_\_\_\_  
Schlenker, PA \_\_\_\_\_  
125 Lincoln Avenue, Suite 303  
Santa Fe, New Mexico 87501 \_\_\_\_\_  
Telephone: (505) 989-9614

**OPPOSITION OR OTHER PARTY**

Amoco Production Company \_\_\_\_\_  
c/o Eric Nitcher \_\_\_\_\_  
Post Office Box 800 \_\_\_\_\_  
Denver, Colorado 80201 \_\_\_\_\_  
(303) 830-4040 \_\_\_\_\_  
name, address, phone and  
contact person

**ATTORNEY**

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

**Pre-hearing Statement**

**NMOCD Case Nos. 9980, 9981, 9982, 9983, 9984, 9985,  
9986, 9987, 9988, 9989, 9990, 9991, 9992 and 9993**

**Page 2**

**STATEMENT OF CASE**

**APPLICANT**

**OPPOSITION OR 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.)

Amoco Production Company opposed a 300% risk penalty on each of these wells in the Basin-Fruitland Coal Gas Pool which are the subject of the cases.

**Pre-hearing Statement**

**NMOCD Case Nos. 9980, 9981, 9982, 9983, 9984, 9985,  
9986, 9987, 9988, 9989, 9990, 9991, 9992 and 9993**

**Page 3**

**PROPOSED EVIDENCE**

**APPLICANT**

**WITNESSES  
(Name and expertise)**

**EST. TIME**

**EXHIBITS**

**OPPOSITION**

**WITNESSES  
(Name and expertise)**

**EST. TIME**

**EXHIBITS**

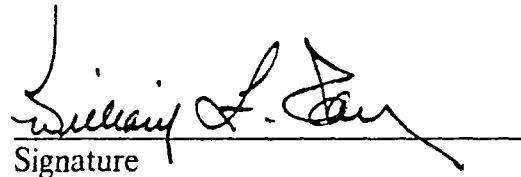
Bill Hawkins

30 Min.

Approximately 5

**PROCEDURAL MATTERS**

None

  
Signature

BEFORE THE  
OIL CONSERVATION DIVISION  
NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS

IN THE MATTER OF THE APPLICATION  
OF MESA OPERATING LIMITED PARTNERSHIP  
FOR COMPULSORY POOLING,  
SAN JUAN COUNTY, NEW MEXICO.

RECEIVED

JUN 25 1990

CASE NO. 9985

OIL CONSERVATION DIVISION

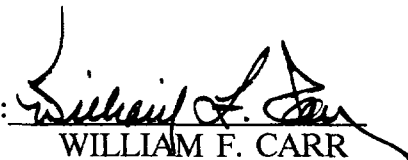
ENTRY OF APPEARANCE

COMES NOW CAMPBELL & BLACK, P.A., and hereby enters its appearance in  
the above referenced case on behalf of Amoco Production Company.

Respectfully submitted,

CAMPBELL & BLACK, P.A.

By:



WILLIAM F. CARR

Post Office Box 2208

Santa Fe, New Mexico 87504

Telephone: (505) 988-4421

ATTORNEYS FOR AMOCO  
PRODUCTION COMPANY

RECEIVED  
JUN 26 AM 8 51  
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KENNETH R. BRANDT (1946 - 1981)

June 22, 1990

PLEASE REPLY TO SANTA FE

Mr. William J. LeMay, Director  
New Mexico Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87504-2088

Re: NMOCD Cases Nos. 9980, 9981, 9982, 9983, 9984, 9985, and  
9986: Application of Mesa Operating Limited Partnership  
for Compulsory Pooling, San Juan County, New Mexico

Dear Mr. LeMay:

On behalf of the Applicant, Mesa Operating Limited  
Partnership, we respectfully request that the above cases be  
continued until the Examiner hearing scheduled for July 11, 1990.

Thank you for your cooperation.

Very truly yours,

  
J. Scott Hall

JSH/ro  
cc: David Catanach  
Mark Seale

MILLER, STRATVERT, TORGERSON & SCHLENKER, P. A.  
LAW OFFICES

RANNE B. MILLER  
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KENNETH R. BRANDT (1946 - 1981)

June 22, 1990

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Mr. William J. LeMay, Director  
New Mexico Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87504-2088

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for Compulsory Pooling, San Juan County, New Mexico

Dear Mr. LeMay:

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Thank you for your cooperation.

Very truly yours,

*J. Scott Hall*  
J. Scott Hall

JSH/ro  
cc: David Catanach  
Mark Seale

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LAW OFFICES

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KENNETH R. BRANDT (1946 - 1981)

June 22, 1990

PLEASE REPLY TO SANTA FE

Mr. William J. LeMay, Director  
New Mexico Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87504-2088

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9986: Application of Mesa Operating Limited Partnership  
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Thank you for your cooperation.

Very truly yours,

*J. Scott Hall*  
J. Scott Hall

JSH/ro  
cc: David Catanach  
Mark Seale

OIL CONSERVATION DIVISION  
RECEIVED

MILLER, STRATVERT, TORGERSON & SCHLENKER, P. A.

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KENNETH R. BRANDT (1946 - 1981)

July 6, 1990

PLEASE REPLY TO SANTA FE

Mr. Michael Stogner  
New Mexico Oil Conservation Division  
310 Old Santa Fe Trail  
Santa Fe, New Mexico 87501

HAND DELIVERED

Re: NMOCDC Case Nos. 10003; 10004; 9980; 9981; 9982; 9983;  
9984; 9985; 9986 - Application of Mesa Operating Limited  
Partnership for Compulsory Pooling, San Juan County, New  
Mexico.

Dear Mr. Stogner:

Enclosed are two copies of consolidated Pre-Hearing Statements  
for each of the above cases (for a total of eighteen copies) for  
your case files.

As of today, I have no indication that any of these cases will  
be opposed. However, Amoco may enter its appearance in certain  
cases.

We hope to consolidate some of the cases for hearing. I will  
advise you in advance of the hearing which cases we will request  
to be consolidated.

Very truly yours,

*J. Scott Hall*  
J. Scott Hall

JSH/ro  
cc: William F. Carr, Esq.



OIL CONSERVATION DIVISION  
RECEIVED

STATE OF NEW MEXICO '90 JUL 6 PM 2 39  
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:

CASE NO. 10003; 10004; 9980;  
9981; 9982; 9983; 9984; 9985; 9986

APPLICATION OF MESA OPERATING  
LIMITED PARTNERSHIP FOR COMPULSORY  
POOLING, SAN JUAN COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This prehearing statement is submitted by Applicant  
as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Mesa Operating Limited Partnership

Mr. Mark Seale

P. O. Box 2009, Amarillo TX 79189-2009

(806) 378-1000

\_\_\_\_\_  
name, address, phone and  
contact person

OPPOSITION OR OTHER PARTY

Amoco Production Company

El Paso Production Company

Conoco, Inc.

\_\_\_\_\_  
name, address, phone and  
contact person

ATTORNEY

J. Scott Hall

Miller, Stratvert, Torgerson & Schlenker, PA

125 Lincoln Ave., Suite 303, Santa Fe, NM 87501

(505) 989-9614

ATTORNEY

STATEMENT OF CASE

APPLICANT

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

Applicant seeks pooling of unjoined interests in Fruitland coal formation. In each case, Applicant seeks 156% risk penalty.

It is believed that Amoco will enter its appearance for purposes of requesting that risk penalty be limited to 156%. Otherwise, no opposition is known.

Applicant will ask that certain cases be consolidated for purposes of testimony. Absent opposition, it is estimated that all cases can be heard in two hours.

OPPOSITION OR 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.)

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Mark Seale Landman	10 min.	3 (location plat; AFE; JOA; joinder letters)
Stuart Samson Geophysicist	10 min.	3 (isopachs; contours)
Tom Hahn Petroleum Engineer	10 min.	2 (production data; well costs)

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)

  
Signature

OIL CONSERVATION DIVISION  
RECEIVED

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

'90 JUL 6 PM 2 39

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

CASE NO. 10003; 10004; 9980;  
9981; 9982; 9983; 9984; 9985; 9986

APPLICATION OF MESA OPERATING  
LIMITED PARTNERSHIP FOR COMPULSORY  
POOLING, SAN JUAN COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This prehearing statement is submitted by Applicant  
as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Mesa Operating Limited Partnership

Mr. Mark Seale

P. O. Box 2009, Amarillo TX 79189-2009

(806) 378-1000

\_\_\_\_\_  
name, address, phone and  
contact person

OPPOSITION OR OTHER PARTY

Amoco Production Company

El Paso Production Company

Conoco, Inc.

\_\_\_\_\_  
name, address, phone and  
contact person

ATTORNEY

J. Scott Hall

Miller, Stratvert, Torgerson & Schlenker, PA

125 Lincoln Ave., Suite 303, Santa Fe, NM 87501

(505) 989-9614

ATTORNEY

STATEMENT OF CASE

APPLICANT

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OPPOSITION OR 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.)

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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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)

  
Signature



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS  
GOVERNOR

July 20, 1990

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

Mr. J. Scott Hall  
Miller, Stratvert, Torgerson  
& Schlenker  
Attorneys at Law  
Post Office Box 1986  
Santa Fe, New Mexico

Re: CASE NO. 9985  
ORDER NO. R-9230

Applicant:  
Mesa Operating  
Limited Partnership

Dear Sir:

Enclosed herewith are two copies of the above-referenced  
Division order recently entered in the subject case.

Sincerely,

*Florene Davidson*

FLORENE DAVIDSON  
OC Staff Specialist

Copy of order also sent to:

Hobbs OCD           x            
Artesia OCD           x            
Aztec OCD           x          

Other William F. Carr