

RECEIVED

JUL 06 1990

OIL CONSERVATION DIV.
SANTA FE

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:

CASE NO. 9997

APPLICATION OF TXO PRODUCTION
CORP. FOR COMPULSORY POOLING
BROWN FEDERAL COM NO. 1 WELL
E/2 SECTION 20, T29S, R25E,
EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by TXO
PRODUCTION CORP. as required by the Oil Conservation
Division.

APPEARANCE OF PARTIES

APPLICANT
(name, address, phone
and contact person)

ATTORNEY

TXO Production Corp.
415 West Wall, Suite 900
Midland, Texas 79701-4468
Attn: Mr. Richard H. Coats
(915) 682-7992

W. Thomas Kellahin
KELLAHIN, KELLAHIN & AUBREY
P.O. Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285

OPPOSITION OR OTHER PARTY
(name, address, phone
and contact person)

ATTORNEY

STATEMENT OF CASE

APPLICANT

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

TXO Production Corp. seeks a compulsory pooling order for the drilling of a well at a standard well location in the E/2 of Section 20, T19S, R25E, Eddy County, New Mexico in order to test for production from a 320-acre spaced pool, any 160-acre spaced pool and any 80 or 40-acre spaced pool.

TXO has been unable despite its efforts to obtain voluntary commitment from all of the working interest owners involved in this well and now needs a compulsory pooling order.

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
Tom Hill (landman)	15 min.	Location map Ownership map
Corky Vickers (petroleum engineer)	10 min.	Tabulation of ownership List of parties and interest to be pooled
Glen Brown (geologist)	20 min.	Correspondence with parties AFE/overhead costs Risk factor penalty geology on primary objective

OPPOSITION

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
-----------------------------------	-----------	----------

PROCEDURAL MATTERS

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

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin
Post Office Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285