

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

RECEIVED

AUG 31 1990

OIL CONSERVATION DIVISION

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

CASE NO. 10067

APPLICATION OF BIRD CREEK RESOURCES,  
 INC. FOR COMPULSORY POOLING,  
 EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by BIRD  
 CREEK RESOURCES, INC. as required by the Oil Conservation  
 Division.

APPEARANCE OF PARTIES

APPLICANT  
 (name, address, phone  
 and contact person)

Bird Creek Resources, Inc.  
 1412 S. Boston, Suite 550  
 Tulsa, Oklahoma 74119  
 Attention: W. Robinette  
 (918) 437-3242

ATTORNEY

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

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

ATTORNEY

Pre-hearing Statement  
NMOCD Case No. \_\_\_\_\_  
Page 3

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES  
(Name and expertise)

EST. TIME

EXHIBITS

Larry Robinette (landman)

15 min.

documentations of  
effort to obtain  
voluntary agreement  
AFE/overhead costs

*Gene Campbell*  
*a*  
(geologist)

15 min

Risk factor

OPPOSITION

WITNESSES  
(Name and expertise)

EST. TIME

EXHIBITS

None anticipated

**PROCEDURAL MATTERS**

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

none

\_\_\_\_\_  
Signature

Pre-hearing Statement  
NMOCD Case No. \_\_\_\_  
Page 2

### STATEMENT OF CASE

#### APPLICANT

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

Applicant has proposed a well to test the possible producing formations from the surface to the base of the Delaware formation, East Loving Delaware Pool, in the SW/4SE/4 of Section 15 T23S, R28E, NMPM, Eddy County N.M.

Despite its efforts, applicant has been unable to obtain the voluntary agreement of all parties and therefore seeks an order from the Division pooling all interests.

#### 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.)

*PHS 830-465*

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

IN THE MATTER OF THE HEARING  
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CONSIDERING:

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AUG 31 1990

CASE NO. OIL CONSERVATION DIVISION

APPLICATION OF

Application of Bird Creek Resources Inc  
for compulsory pooling, Eddy County  
New Mexico

Case 10067

PRE-HEARING STATEMENT

This prehearing statement is submitted by Bird Creek Resources  
as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

BirdCreek

WPK

Att: Larry Robinette

name, address, phone and  
contact person

OPPOSITION OR OTHER PARTY

ATTORNEY

name, address, phone and  
contact person

Pre-hearing Statement  
 NMOCD Case No. 10067  
 Page 3

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
Lawrence W. Robinette (landman)	15 minutes	Documentations of efforts to obtain voluntary agreement AFE/overhead costs
Gene Campbell (geologist)	15 minutes	Risk factor

OPPOSITION

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
None anticipated.		

**PROCEDURAL MATTERS**

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

None.

KELLAHIN, KELLAHIN & AUBREY

By: 

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

Pre-hearing Statement  
NMOCD Case No. 10067  
Page 2

### STATEMENT OF CASE

#### APPLICANT

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

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Despite its efforts, applicant has been unable to obtain the voluntary agreement of all parties and therefore seeks an order from the Division pooling all interests.

#### 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)