

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

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KENNETH R. BRANDT (1946 - 1981)

September 25, 1990

PLEASE REPLY TO SANTA FE

RECEIVED

10125

Mr. William J. LeMay, Director
New Mexico Oil Conservation Division
Post Office Box 2008
Santa Fe, New Mexico 87504

SEP 25 1990

HAND DELIVERED

OIL CONSERVATION DIVISION

RE: Application of Mesa Operating Limited Partnership for
Compulsory Pooling, San Juan County, New Mexico, (FC Fed
Com #42)

Dear Mr. LeMay:

Enclosed is the Application of Mesa Operating Limited
Partnership for Compulsory Pooling for a Fruitland well to be
drilled at a standard location in the S/2 of Section 32, T-31 N,
R-9 W, NMPM, San Juan County, New Mexico.

On behalf of the Applicant, Mesa Operating Limited
Partnership, we ask that this matter be set for examiner hearing
on October 17, 1990.

Very truly yours,

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

By: J. Scott Hall
J. Scott Hall

JSH/rom

cc: Hank Wood,
Mesa Limited Partnership

BEFORE THE
OIL CONSERVATION DIVISION
ENERGY, MINERALS, AND NATURAL RESOURCES DEPARTMENT

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

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SEP 25 1990 CASE NO. 10125

APPLICATION OIL CONSERVATION DIVISION

MESA OPERATING LIMITED PARTNERSHIP by its undersigned attorneys, Miller, Stratvert, Torgerson & Schlenker, P.A., hereby makes application pursuant to section 70-2-17, N.M.S.A. (1978) for an order pooling all of the mineral interests in the Fruitland coal formation for development on 320-acre spacing in and under the S/2 of Section 32, Township 31 North, Range 9 West, N.M.P.M., San Juan County, New Mexico, and in support thereof would show the Division:

1. Applicant owns or controls approximately 25.07% of the working interest in and under the S/2 of Section 32, and Applicant has the right to drill thereon.

2. Applicant proposes to dedicate the above-referenced pooled unit to its FC Fed Com #42 well to be located at a standard location in the S/2 of said Section 32.

3. Applicant has been unable to obtain voluntary agreement for pooling or farmout from all other interest owners in the S/2 of said Section 32.

4. Said pooling of interests will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.

5. In order to permit the Applicant to obtain its just and fair share of the oil and gas underlying the subject lands, the mineral interests should be pooled, and Applicant should be designated the operator of the well to be drilled.

WHEREFORE, Applicant prays that this application be set for hearing before a duly appointed examiner of the Oil Conservation Division on October 17, 1990, and that after notice and hearing as required by law, the Division enter its order pooling the lands, including provisions for Applicant to recover its costs of drilling, equipping and completing the well, its costs of supervision while drilling and after completion, including overhead charges, and imposing a risk factor for the risk assumed by the Applicant in drilling, completing and equipping the well, and making such other and further provisions as may be proper in the premises.

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

By J. Scott Hall
J. Scott Hall
Suite 303
125 Lincoln Avenue
Santa Fe, New Mexico 87501
Telephone: (505) 989-9614

ATTORNEYS FOR MESA OPERATING
LIMITED PARTNERSHIP

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

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OCT 12 1990

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KENNETH R. BRANDT (1946 - 1981)

October 12, 1990

PLEASE REPLY TO SANTA FE

Mr. William J. LeMay, Director
New Mexico Oil Conservation Division
310 Old Santa Fe Trail
Santa Fe, New Mexico 87501

HAND DELIVERED

Re: NMOCD Case Nos. 10117, 10118, 10119, 10120, 10121, 10123,
10124, ~~10125~~ - Application of Mesa Operating Limited
Partnership for Compulsory Pooling, San Juan County, New
Mexico

Dear Mr. LeMay:

Enclosed are the original and two copies of the Applicant's
Consolidated Pre-Hearing Statement in the above matter.

Very truly yours,

J. Scott Hall

J. Scott Hall

JSH/rom
cc: Hank Wood

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

OCT 12 1990

OIL CONSERVATION DIVISION

CASE NO. 10117, 10118, 10119
10120, 10121, 10123, 10124, 10125

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

CONSOLIDATED
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. Hank Wood

P. O. Box 2009

Amarillo, Texas 79189-2009

(806) 378-1093

name, address, phone and
contact person

OPPOSITION OR OTHER PARTY

name, address, phone and
contact person

ATTORNEY

J. Scott Hall

Miller, Stratvert, Torgerson
& Schlenker, P.A.

P. O. Box 1986

Santa Fe, New Mexico 87504-1986

(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 orders pooling unjoined mineral interests in the Fruitland coal formation, designating Applicant operator, establishing costs of drilling, completion and supervision and risk penalty for drilling the subject wells. All wells are at standard locations.

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
Hank Wood, Landman	10	Land plat, JOA/AFE, well proposals
Stewart Samson, Geophysicist	8	Isopach, contour
Tom Hahn, Petroleum Engineer	8	AFE, Production volumes

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)

Certain cases may be consolidated.

Z. Scott Hall

Signature