

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. 10219

APPLICATION OF HANLEY PETROLEUM, INC.
FOR COMPULSORY POOLING, LEA COUNTY,
NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by HANLEY
PETROLEUM INC. as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT
(name, address, phone
and contact person)

Hanley Petroleum Inc.
415 W. Wall, Ste. 1500
Midland, TX 79701
Attn: Jim Rogers
(915) 684-8051

ATTORNEY

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)

Santa Fe Energy Operating
Partners, L.P.

ATTORNEY

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

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JAN 18 1991

OIL CONSERVATION DIV.
SANTA FE

STATEMENT OF CASE

APPLICANT

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

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.)

Hanley Petroleum Inc. seeks an order pooling all mineral interests from the surface to the base of the Wolfcamp formation underlying the following described acreage in Section 8, T18S, R33E, and in the following manner: the W/2NW/4 to form a standard 80-acre oil spacing and proration unit for any and all formations and/or pools developed on 80-acre spacing within said vertical extent, which presently includes but is not necessarily limited to the Undesignated South Corbin-Wolfcamp Pool; and the SW/4NW/4 to form a standard 40-acre oil spacing and proration unit for any and all formations and/or pools developed on 40-acre spacing within said vertical extent, which presently includes but is not necessarily limited to the Undesignated West Corbin-Delaware Pool, Undesignated Central Corbin-Queen Pool, Undesignated West Corbin-San Andres Pool, and Undesignated Corbin-Bone Spring Pool. Said units are to be dedicated to a single well to be drilled at a standard oil well location on said Section 8.

Hanley has sought the voluntary agreement of the owners of the non-consenting working interests for the formation of appropriate spacing and proration units, and has been unable to obtain voluntary agreement.

Hanley Petroleum Inc. is the majority working interest owner in the spacing unit and seeks to be designated operator.

PROPOSED EVIDENCE

APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
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OPPOSITION

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
Jim Rogers (landman)	30 Min.	Surface ownership map
L.D. Robbins or Brett Bracken (geologist)	30 Min.	Tabulation of interest owners and percentages Operating Agreement AFE
Bill Huck (petroleum engineer)	30 Min.	Geologic maps Production maps

PROCEDURAL MATTERS

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

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin

P.O. Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285

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

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

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OIL CONSERVATION DIVISION

APPLICATION OF SANTA FE ENERGY
OPERATING PARTNERS, L.P. FOR
COMPULSORY POOLING, LEA COUNTY,
NEW MEXICO.

Case No. 10,211

APPLICATION OF HANLEY PETROLEUM, INC.
FOR COMPULSORY POOLING, LEA COUNTY,
NEW MEXICO.

Case No. 10,219

CONSOLIDATED PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Santa Fe Energy Operating Partners, L.P. as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

PARTIES	ATTORNEY
(1) Santa Fe Energy Operating Partners, L.P. 550 West Texas, Suite 1330 Midland, Texas 79701 (915) 687-3551 Attention: Larry Murphy	James Bruce Hinkle, Cox, Eaton, Coffield & Hensley 500 Marquette, N.W. Suite 800 Albuquerque, N.M. 87102 (505) 768-1500
(2) Hanley Petroleum, Inc. (Hanley has filed its own Pre-Hearing Statements.)	W. Thomas Kellahin

STATEMENT OF CASE

SANTA FE:

Santa Fe seeks an order pooling all interests in all pools and formations spaced on 80 acres from the surface to the base of the Wolfcamp formation underlying the $W\frac{1}{2}NW\frac{1}{4}$ of Section 8, Township 18 South, Range 33 East, N.M.P.M., in Eddy County. Applicant seeks to drill a well at a standard location, to be named the operator of the well, and to have a 200% risk penalty imposed on the non-consenting interest owner. Santa Fe has not been able to come to terms with Hanley despite seeking to obtain a voluntary agreement. 50%

of the working interest is committed to the well, with Santa Fe as the agreed operator.

HANLEY:

See Hanley's Pre-Hearing Statements.

PROPOSED EVIDENCE

SANTA FE:

	WITNESS	EST. TIME	EXHIBITS
1.	Larry Murphy (Landman)	25 minutes	(a) Land Plat (b) Correspondence (c) AFE (d) Notice Letter (e) Lists of wells operated in New Mexico
2.	John Thoma (Geologist)	35 minutes	(a) Structure Map (b) Porosity isopach (c) Cross-section (d) Well logs
3.	Darryl Roberts (Petroleum Engineer)	30 minutes	(a) AFE
4.	_____ (Reservoir Engineer)	20 minutes	

HANLEY:

WITNESS	EST. TIME	EXHIBITS
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See Hanley's Pre-Hearing Statements.

PROCEDURAL MATTERS

The subpoena issues in this case remain unresolved.

Respectfully Submitted,

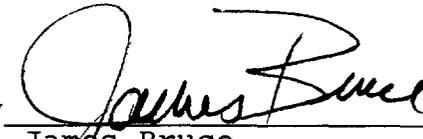
HINKLE, COX, EATON, COFFIELD &
HENSLEY

By 
James Bruce
500 Marquette, N.W.
Suite 800
Albuquerque, New Mexico 87102
(505) 768-1500

Attorneys for Santa Fe Energy
Operating Partners, L.P.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was mailed this 29th day of January, 1991 to W. Thomas Kellahin, P. O. Box 2265, Santa Fe, New Mexico 87504.

By 
James Bruce

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

IN THE MATTER OF THE HEARING
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APPLICATION OF HANLEY PETROLEUM INC.
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.

OIL CONSERVATION DIVISION

PRE-HEARING STATEMENT

This Prehearing Statement is submitted by William F. Carr, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Hanley Petroleum Inc. _____

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name, address, phone and
contact person

ATTORNEY

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

OPPOSITION OR OTHER PARTY

Harvey E. Yates Company _____
c/o Melissa Randall _____
Post Office Box 1933 _____
Roswell, New Mexico 88202 _____
(505) 623-6601 _____

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 _____

Santa Fe Energy Operating _____

Telephone:

James Bruce _____
Hinkle, Cox, Eaton, Coffield & Hensley
500 Marquette, NW _____
Albuquerque, New Mexico 87102 _____
Telephone: (505) 768-1500

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.)

Appear and present a statement in support of Santa Fe Energy Operating Partners, L.P.

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

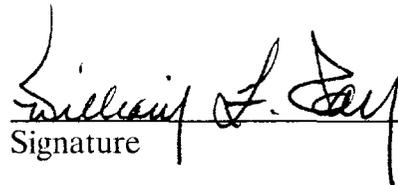
WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

None

PROCEDURAL MATTERS


Signature