

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 THE APPLICATION OF
MOBIL EXPLORATION & PRODUCING
U.S., INC. FOR AN UNORTHODOX
OIL WELL LOCATION AND A NON-STANDARD
OIL PRORATION UNIT, RIO ARRIBA
COUNTY, NEW MEXICO.

Case No. 10255

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted on behalf of the applicant Mobil Exploration and Producing U.S., Inc. as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

Applicant: Mobil Exploration & Producing U.S., Inc.

Contact
Person: Jorge Faz
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OIL CONSERVATION DIV.
SANTA FE

APPLICANT'S STATEMENT OF THE CASE

Applicant is a party owning an interest in Section 6, Township 24 North, Range 2 West, N.M.P.M., Rio Arriba County, New Mexico. Applicant has the right to drill and proposes to drill a well in the undesignated West Lindrith Gallup-Dakota Oil Pool for its Lindrith "B" Unit Well No. 78 to be located 2,030 feet from the south line and 143 feet from the west line of Section 6. Applicant is the working interest owner in Section 5 to the west of this location. Applicant is moving this well closer to the west line than is permitted under standard rules but is moving that well closer to its own acreage.

APPLICANT'S PROPOSED EVIDENCE

Applicant expects to call one witness, a petroleum engineer at such hearing. At this time, applicant expects to use fewer than 10 exhibits and believes that the direct testimony in this case can be presented in 30 minutes or less.

PROCEDURAL MATTERS

Applicant is not aware of any procedural matters which need to be resolved prior to the hearing of this case.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By 

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Attorneys for Mobil Producing &
Exploration U.S., Inc.

CERTIFICATE OF SERVICE

I certify that I had a copy of this Pre-Hearing Statement mailed to Jerome P. McHugh, Jerome P. McHugh & Associates, 650 South Cherry Street, Suite 1225, Denver, Colorado 80222 on March 1, 1991.



W. Perry Pearce

[WPP/90]