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June 7, 1990

FEDERAL EXPRESS

Mr. William J. LeMay, Director
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Dear Mr. LeMay:

Enclosed for filing, please find three copies of C. W. Trainer's Pre-hearing Statement for the hearing of the Application of C. W. Trainer for compulsory pooling for its Wallace No. 1 in Lea County, New Mexico, set for June 13, 1990.

Very truly yours,

LOSEE, CARSON, HAAS & CARROLL, P.A.



Ernest L. Carroll

ELC:kth
Enclosures

xc w/encl: C. W. Trainer

6000

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

IN THE MATTER OF THE APPLICATION OF :
C. W. TRAINER FOR CUMPULSORY POOLING, : CASE NO. 4957
LEA COUNTY, NEW MEXICO :
:

PRE-HEARING STATEMENT

This prehearing statement is submitted by C. W. Trainer, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

C. W. Trainer
P. O. Box 755
Hobbs, New Mexico 88240
(505)393-2727

Ernest L. Carroll
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OPPOSITION OR OTHER PARTY

ATTORNEY

See attached Exhibit "A"

No attorneys are known

STATEMENT OF CASE

APPLICANT

Applicant has the right to re-enter the Wallace No. 1 Well, 1650' from the south line and 1650' from the east line of Section 31, Township 11 South, Range 38 East, N.M.P.M., Lea County, New Mexico. Applicant has dedicated the NW/4 SE/4 of said section to this well, and there are interest owners in the proration unit who have not agreed to pool their interests. Applicant is seeking to force pool those interest owners.

OPPOSITION OR OTHER PARTY

See attached Exhibit "A", which sets out the interest owners and their status as we know it in regard to this matter.

PROPOSED EVIDENCE

APPLICANT

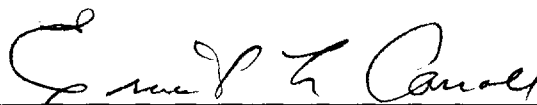
<u>WITNESSES</u> (Name and expertise)	EST. TIME	EXHIBITS
C. W. Trainer, Engineer	1/2 hour	Land Plat Ownership list Geological map Correspondence reflecting attempts to get unleased mineral interest owners to join in well
Gene Lee, Engineering Consult.	1/2 hour	AFE

OPPOSITION

Unknown

PROCEDURAL MATTERS

None known.



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Attorneys for C. W. Trainer, Applicant

EXHIBIT "A"

Interest Owners
Township 11 South, Range 38 East, N.M.P.M.
Lea County, New Mexico

<u>Owner</u>	<u>Leased</u>	<u>Waiver</u>	<u>Contested</u>
Isa Wallace, Deceased P. O. Box 892 Bethany, Okla. 73008		Yes	
Robert D. Wallace 3504 N. Thompkins Bethany, Okla. 73008		Yes	
Estate of Iris Goldston, Deceased c/o Goldston Oil Corporation P. O. Box 570365 Houston, Texas 77257-0365	Yes		
Nancy Zoe Goldston Herpin c/o Goldston Oil Corporation P. O. Box 570365 Houston, Texas 77257-0365	Yes		
Jack H. Mayfield, Jr. c/o Goldston Oil Corporation P. O. Box 570365 Houston, Texas 77257-0365	Yes		
W. C. Hubbard Jere Hubbard, wife 602 First Natl. Bank Bldg. Midland, Texas 79701		Yes	
Betty S. King a single woman 909 Ventura Midland, Texas 79705	Yes		
Dee H. Rose a single man 2901 Rebel Midland, Texas 79707	Yes	Yes	
C. E. S. Bellows, III Helen H. Bellows, wife 6 Ashline Drive Midland, Texas 79705			Assumed, due to no answer
Hugh N. Frenzel, Deceased Dorothy C. Frenzel, wife 1118 Mogford Midland, Texas 79701		Yes	
Estate of Ellen DeChicchis Pittman Marshall, deceased Lea County, N.M., DC #P-85-12 T.J. Brown, Ancillary Per. Rep. P. O. Box 1251 Midland, Texas 79702		Yes	
The William K. Warren Fdn. P. O. Box 971 Midland, Texas 79702			Yes
Thomas Grier Fischer 1911 Sedgie Houston, Texas 77080			Notice ret'd

Dorothy Looney
6317 Crab Orchard
Houston, Texas 77057

Assumed due
to no answer

Stephens Production Co.
P. O. Box 2407
Fort Smith, Ark. 72902

Yes

Coastal Oil & Gas Corp.
P. O. Box 235
Midland, Texas 79702

Assumed due
to no answer

W. C. Partee
a single man
P. O. Box 667
Magnolia, Ark. 71753

Yes

T. J. Raney & Sons
P. O. Box 3647
Little Rock, Ark. 72203

Assumed due
to no answer

Edward Graham Gallagher
Testamentary Tr. u/w of Elmer
E. Batzell, dec.; Edna Mae
Batzell, his widow
730 - 15th St. NW - Suite 800
Washington, D.C. 20005

Assumed due
to no answer

Walter K. Graham
Maxine Graham, wife
1504 Soplo Road, SE
Albuquerque, New Mexico 87123

Yes

Marguerite M. Richardson
2365 Stanley Hills Drive
Hollywood, Calif. 90028

Assumed due
to no answer

E. M. Anderson
P. O. Box 701
Magnolia, Ark. 71753

Assumed due
to no answer

Estate of Terry Anderson Curry
Mr. H. A. Moore III, Administrator
Moore & Jones
P. O. Box 1828
Hattiesburg, Mississippi 39403

Assumed due
to no answer

Margaret Anderson Stokes
Eddy Geriatric Center
Room 20
2256 Burdett Ave
Troy, New York 12180

Assumed due
to no answer