

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. 10226

APPLICATION OF BIRD CREEK RESOURCES
FOR SPECIAL POOL RULES FOR THE EAST
LOVING-DELAWARE POOL, EDDY COUNTY,
NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by ORYX ENERGY
COMPANY as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT
(name, address, phone
and contact person)

Bird Creek Resources

ATTORNEY

William F. Carr
Campbell & Black, P.A.
P.O. Box 2208
Santa Fe, NM 87504

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

Oryx Energy Company
P.O. Box 2880
Dallas, TX 75231
Attn: Charles Gray
(214) 890-6259

ATTORNEY

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

RECEIVED

FEB 01 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.)

Oryx Energy Company opposes the applicant's request for an increased gas-oil ratio for this pool. The application should be denied.

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES
(name and expertise)

EST. TIME

EXHIBITS

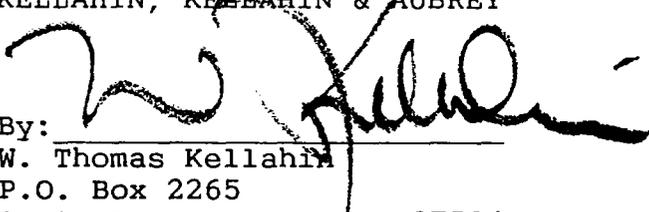
Witnesses unknown at this time

PROCEDURAL MATTERS

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

Applicant has informed Oryx that this case will be continued at the request of the applicant to the Examiner's hearing of February 21, 1991.

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 HEARING
CALLED BY THE OIL CONSERVATION
DIVISION FOR THE PURPOSE OF
CONSIDERING:

CASE NO. 10226

APPLICATION OF BIRD CREEK RESOURCES
FOR SPECIAL POOL RULES,
EDDY COUNTY, NEW MEXICO.

RECEIVED

FEB 1 1997

PRE-HEARING STATEMENT

OIL CONSERVATION DIVISION

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

APPEARANCES OF PARTIES

APPLICANT

Bird Creek Resources _____
c/o Brad Burks _____
810 South Cincinnati, Suite 110 _____
Tulsa, Oklahoma 74119 _____
(918) 582-3855 _____

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 _____

OPPOSITION OR OTHER PARTY

ORYX Energy Company _____

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 _____

STATEMENT OF CASE

APPLICANT

Bird Creek Resources, applicant, seeks an order promulgating special rules and regulations for the East Loving-Delaware Pool including a provision for a limiting gas-oil ratio of 5000 cubic feet of gas per barrel of oil. Said pool is located in Township 23 South, Range 28 East.

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

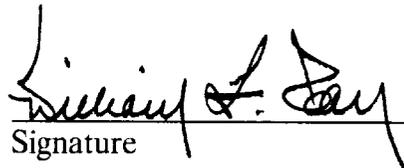
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Brad Burks, Petroleum Engineer	20 Min.	Approximately 8

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

None.


Signature

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

RECEIVED

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

FEB 15 1991

OIL CONSERVATION DIV.
SANTA FE

CASE NO. 10226

APPLICATION OF BIRD CREEK RESOURCES
FOR SPECIAL POOL RULES FOR THE EAST
LOVING-DELAWARE POOL, EDDY COUNTY,
NEW MEXICO

FIRST SUPPLEMENTAL
PRE-HEARING STATEMENT

This pre-hearing statement is submitted by ORYX ENERGY
COMPANY as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT
(name, address, phone
and contact person)

ATTORNEY

Bird Creek Resources

William F. Carr
Campbell & Black, P.A.
P.O. Box 2208
Santa Fe, NM 87504

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

ATTORNEY

Oryx Energy Company
P.O. Box 2880
Dallas, TX 75231
Attn: Charles Gray
(214) 890-6259

W. Thomas Kellahin
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(505) 982-4285

Pre-hearing Statement
NMOCD Case No. 10226
Page 2

R.C. Bennett and
R.B. Operating Inc.

James Bruce
Hinkle, Cox, Eaton, Coffield &
Hensley
500 Marquette, Suite 740
Albuquerque, New Mexico 87102
(505) 768-1500

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.)

Cryx Energy Company opposes the applicant's request for an increased gas-oil ratio for this pool. The application should be denied.

PROPOSED EVIDENCE

APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
-----------------------------------	-----------	----------

OPPOSITION

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
Bonnie Wilson (PE)	60 Min.	8
Bib Sidlowe (geologist)	45 Min.	6

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

HINKLE, COX, EATON, COFFIELD & HENSLEY

ATTORNEYS AT LAW

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(505) 768-1500

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O. M. CALHOUN*
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JOE W. WOOD
RICHARD S. MORRIS

CLARENCE E. HINKLE (1901-1985)
W. E. BONDJURANT, JR. (1913-1973)
ROY C. SNODGRASS, JR. (1914-1987)

February 18, 1991

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STUART D. SHANOR
ERIC D. LANPHERE
C. D. MARTIN
PAUL J. KELLY, JR.
MARSHALL G. MARTIN
OWEN M. LOPEZ
DOUGLAS L. LUNSFORD
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WILLIAM B. BURFORD*
RICHARD E. OLSON
RICHARD R. WILFONG*
THOMAS J. MCBRIDE
STEVEN D. ARNOLD
JAMES J. WECHSLER
NANCY S. CUSACK
JEFFREY L. FORNACIAR
JEFFREY D. HEWETT
JAMES BRUCE
JERRY F. SHACKELFORD*
JEFFREY W. HELLBERG*
ALBERT L. PITTS
THOMAS M. HNASKO
JOHN C. CHAMBERS*
MICHAEL A. GROSS
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FRA NKLIN H. MCCALLUM*
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MARK C. DOW
KARIN M. R. CHARDSON*
FRED W. SCHWENDIMANN
JAMIS M. HUDSON

STANLEY K. KOTOVSKY JR.
BETTY H. LITTLE*
JEFFREY S. BAIRD*
RUTH S. MUSGRAVE
HOWARD R. THOMAS
PATRICIA A. WATTS
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REBECCA NICHOLS JOHNSON
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ELLIEN S. CASEY
S. BARRY PAISNER
MARGARET CARTER LUDEWIG
MARTIN MEYERS
GREGORY S. WHEELER
ANDREW J. CLOUTIER
JAMIS A. GILLESPIE
GARRETT W. LARSON
STEHANIE LANDRY
JOHN R. KULSETH, JR.
LISA K. SMITH*

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FAX (806) 372-9761

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*NOT LICENSED IN NEW MEXICO

Ms. Florene Davidson
New Mexico Oil Conservation
Division
P. O. Box 2088
Santa Fe, New Mexico 87504

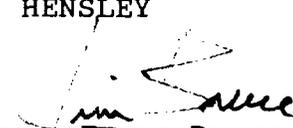
Re: Pre-Hearing Statements by R.C. Bennett/R.C. Bennett Company
and RB Operating Company/RAMCO NYL 1987 Limited Partnership
in Case No. 10,226

Dear Florene:

Please file these Pre-Hearing Statements. They were
previously telecopied to the Division.

Very truly yours,

HINKLE, COX, EATON, COFFIELD &
HENSLEY

By: 
James Bruce

JB:le
Enclosures

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

RECEIVED

FEB 1 1971

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

OIL CONSERVATION DIVISION

Case No. 10,226

APPLICATION OF BIRD CREEK
RESOURCES FOR SPECIAL POOL RULES,
EDLY COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by R.C. Bennett
and R.C. Bennett Company as required by the Oil Conservation
Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

OPPOSITION OR OTHER PARTY

ATTORNEY

R.C. Bennett/R.C. Bennett Co.
P. O. Box 264
Midland, Texas 79702
(915) 683-3062

James Bruce
Hinkle, Cox, Eaton,
Coffield & Hensley
500 Marquette, N.W.
Suite 800
Albuquerque, N.M. 87102

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.)

These parties request that if the application is granted, the pool rules be temporary for a maximum period of six months, and that thereafter the rules be reviewed again. The subject pool is new and these parties feel several months additional production is necessary to establish the necessity of special pool rules.

PROPOSED EVIDENCE

APPLICANT

WITNESS (Name and expertise)	EST. TIME	EXHIBITS
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OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
-----------------------------------	-----------	----------

-None-

PROCEDURAL MATTERS

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

Respectfully Submitted,

HINKLE, COX, EATON, COFFIELD &
HENSLEY

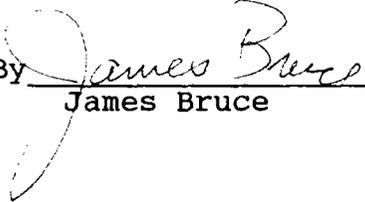
By 

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

Attorneys for RB Operating
Company and RAMCO NYL
1987 Limited Partnership

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was mailed this 18th day of February, 1991 to William F. Carr, P. O. Box 2208, Santa Fe, New Mexico 87504, and 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

RECEIVED

FEB 24 1991

OIL CONSERVATION DIVISION

Case No. 10,226

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

APPLICATION OF BIRD CREEK
RESOURCES FOR SPECIAL POOL RULES,
EDLY COUNTY, NEW MEXICO.

AMENDED
PRE-HEARING STATEMENT

This pre-hearing statement is submitted by R.C. Bennett
and R.C. Bennett Company as required by the Oil Conservation
Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

OPPOSITION OR OTHER PARTY

ATTORNEY

R.C. Bennett/R.C. Bennett Co.
P. O. Box 264
Midland, Texas 79702
(915) 683-3062

James Bruce
Hinkle, Cox, Eaton,
Coffield & Hensley
500 Marquette, N.W.
Suite 800
Albuquerque, N.M. 87102

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.)

These parties request that the application be denied. The subject pool is new and these parties feel several months additional production is necessary to establish the necessity of special pool rules. The increased GOR may deplete the reservoir's pressure and energy. If the application is granted, the pool rules should be temporary for a maximum period of six months, and that thereafter the rules be reviewed again.

PROPOSED EVIDENCE

APPLICANT

WITNESS (Name and expertise)	EST. TIME	EXHIBITS
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OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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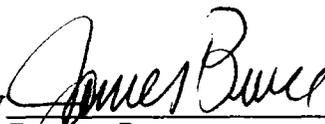
-None-

PROCEDURAL MATTERS

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

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 R.C. Bennett

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was mailed this 20th day of February, 1991 to William F. Carr, P. O. Box 2208, Santa Fe, New Mexico 87504, and 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

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FEB 21 1991

OIL CONSERVATION DIVISION

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

Case No. 10,226

APPLICATION OF BIRD CREEK
RESOURCES FOR SPECIAL POOL RULES,
EDDY COUNTY, NEW MEXICO.

SECOND AMENDED
PRE-HEARING STATEMENT

This pre-hearing statement is submitted by RB Operating Company and RAMCO NYL 1987 Limited Partnership as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

William F. Carr
P. O. Box 2208
Santa Fe, New Mexico 87504

OPPOSITION OR OTHER PARTY

ATTORNEY

RB Operating Company
RAMCO NYL 1987 Limited Partnership
6120 South Yale, Suite 1700
Tulsa, Oklahoma 74136
(918) 492-1700
Attention: S. Lobaugh

James Bruce
Hinkle, Cox, Eaton,
Coffield & Hensley
500 Marquette, N.W.
Suite 800
Albuquerque, N.M. 87102

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.)

These parties request that if the application is granted, the pool rules be temporary for only six months, and that thereafter the rules be reviewed again.

PROPOSED EVIDENCE

APPLICANT

WITNESS (Name and expertise)	EST. TIME	EXHIBITS
---------------------------------	-----------	----------

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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-None-

PROCEDURAL MATTERS

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

Respectfully Submitted,

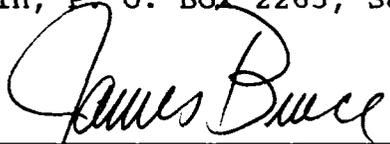
HINKLE, COX, EATON, COFFIELD &
HENSLEY

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

Attorneys for RB Operating
Company and RAMCO NYL
1987 Limited Partnership

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was mailed this 20th day of February, 1991 to William F. Carr, P. O. Box 2208, Santa Fe, New Mexico 87504, and 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

RECEIVED
FEB 21 1977
OIL CONSERVATION DIVISION

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

Case No. 10,226

APPLICATION OF BIRD CREEK
RESOURCES FOR SPECIAL POOL RULES,
EDLY COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Pogo Producing Company as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

OPPOSITION OR OTHER PARTY

ATTORNEY

Pogo Producing Company
Midland, Texas 79701
(915) 682-6822
Attention: J. Cooper

James Bruce
Hinkle, Cox, Eaton,
Coffield & Hensley
500 Marquette, N.W.
Suite 800
Albuquerque, N.M. 87102

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.)

See attached letter.

PROPOSED EVIDENCE

APPLICANT

WITNESS (Name and expertise)	EST. TIME	EXHIBITS
---------------------------------	-----------	----------

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
-----------------------------------	-----------	----------

-None-

PROCEDURAL MATTERS

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

Respectfully Submitted,

HINKLE, COX, EATON, COFFIELD &
HENSLEY

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

Attorneys for Pogo Producing
Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was telecopied this 20th day of February, 1991 to William F. Carr, P. O. Box 2208, Santa Fe, New Mexico 87504, and W. Thomas Kellahin, P. O. Box 2265, Santa Fe, New Mexico 87504.

By James Bruce
James Bruce



Pogo Producing Company

2916 Allen Parkway • Post Office Box 2504 • Houston, Texas 77252-2504 • 713-630-4747

HARVEY L. GOLD
Vice President
Engineering

February 20, 1991

New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87504-2088

Re: Case No. 10226
Applicant Bird Creek Resources
Special Pool Rule
East Loving - Delaware Pool
Township 23 South, Range 28 East
Lea County, New Mexico

Gentlemen:

This letter is in reference to the Bird Creek Resources application for Special Pool Rules for the East Loving, Delaware Pool, Lea County, New Mexico. In regard to Bird Creek Resources request for a gas-oil ratio of 5000 cubic feet per barrel of oil, Pogo Producing Company suggests a gas-oil ratio of 3500 cubic feet per barrel of oil.

Pogo Producing Company has not had time to prepare for a hearing after receipt of relevant field production and reservoir data, but would like to submit our position in writing. We believe that a significant gas-oil ratio increase above 2000 at this time may result in premature reservoir pressure depletion. The premature depletion of this gas drive aspect of the reservoir could result in trapped reservoir oil, which would otherwise be recovered. Pogo Producing Company therefore believes that at this early stage of reservoir depletion a gas-oil ratio above 3500 cubic feet per barrel of oil could result in a waste of natural resources. This position should be subject to review based on reservoir performance in 6 to 12 months.

Yours very truly,

Harvey L. Gold
Harvey L. Gold

JAC/DB/jh

HINKLE, COX, EATON, COFFIELD & HENSLEY

5103

ATTORNEYS AT LAW

500 MARQUETTE N.W., SUITE 800
ALBUQUERQUE, NEW MEXICO 87102-2121

(505) 768-1500

FAX (505) 768-1529

OF COUNSEL
O. M. CALHOUN*
MACK EASLEY
JOE W. WOOD
RICHARD S. MORRIS

CLARENCE E. HINKLE (1901-1985)
W. E. BONDURANT, JR. (1913-1973)
ROY C. SNODGRASS, JR. (1914-1987)

January 31, 1991

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ERIC D. LANPHERE
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MARSHALL G. MARTIN
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WILLIAM B. BURFORD*
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JEFFREY D. HEWETT
JAMES BRUCE
JERRY F. SHACKELFORD*
JEFFREY W. HELLBERG*
ALBERT L. PITTS
THOMAS M. HNASKO
JOHN C. CHAMBERS*
MICHAEL A. GROSS
THOMAS D. HAINES, JR.

FRAANKLIN H. MCCALLUM*
GREGORY J. NIBERT
DAVID T. MARKETTE*
MAFAC C. DOW
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FRED W. SCHWENDIMANN
JAMES M. HUDSON

STALEY K. KOTOVSKY JR.
BETTY H. LITTLE*
JEFFREY S. BAIRD*
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HOWARD R. THOMAS
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S. BARRY PAISNER
MARGARET CARTER LUDEWIG
MARTIN MEYERS
GREGORY S. WHEELER
ANDREW J. CLOUTIER
JAMES A. GILLESPIE
GARRET W. LARSON
STEPHANIE LANDRY
JOHN R. KULSETH, JR.
LISA K. SMITH*

*NOT LICENSED IN NEW MEXICO

Ms. Florene Davidson
New Mexico Oil Conservation
Division
P. O. Bcx 2088
Santa Fe, New Mexico 87504

Dear Flcrene:

Enclosed is an original and one copy of a Pre-Hearing
Statement regarding case no. 10,226. Please file it in the
appropriate file. Thank you.

Very truly yours,

HINKLE, COX, EATON, COFFIELD &
HENSLEY

By: James Bruce

James Bruce
by Lisa Ellsworth
Sec.

JB:le
Enclosures

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

RECEIVED

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

FEB 1 1987
OIL CONSERVATION DIVISION

Cases Nos: 10,226

APPLICATION OF BIRD CREEK
RESOURCES FOR SPECIAL POOL RULES,
EDLY COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by RB Operating Company and RAMCO NYL 1987 Limited Partnership as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

OPPOSITION OR OTHER PARTY

ATTORNEY

RB Operating Company
6120 South Yale, Suite 1700
Tulsa, Oklahoma 74136
(918) 492-1700
Attention: S. Lobaugh

James Bruce
Hinkle, Cox, Eaton,
Coffield & Hensley
500 Marquette, N.W.
Suite 800
Albuquerque, N.M. 87102

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.)

These parties request that if the application be granted, the pool rules be temporary for only six months, and that thereafter the rules be reviewed again.

PROPOSED EVIDENCE

APPLICANT

WITNESS (Name and expertise)	EST. TIME	EXHIBITS
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OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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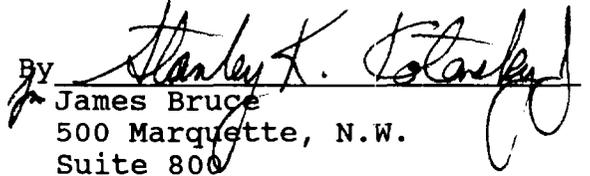
-None-

PROCEDURAL MATTERS

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

Respectfully Submitted,

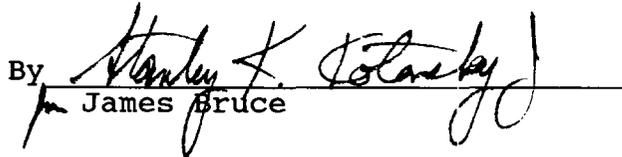
HINKLE, COX, EATON, COFFIELD &
HENSLEY

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

Attorneys for RB Operating
Company and RAMCO NYL
1987 Limited Partnership

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was mailed this 31st day of January, 1991 to William F. Carr, P. O. Box 2208, Santa Fe, New Mexico 87504.

By 
James Bruce

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

RECEIVED

FEB 1 1991

OIL CONSERVATION DIVISION

Case No. 10,226

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

APPLICATION OF BIRD CREEK
RESOURCES FOR SPECIAL POOL RULES,
EDLY COUNTY, NEW MEXICO.

AMENDED
PRE-HEARING STATEMENT

This pre-hearing statement is submitted by RB Operating Company and RAMCO NYL 1987 Limited Partnership as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

OPOSITION OR OTHER PARTY

ATTORNEY

RB Operating Company
RAMCO NYL 1987 Limited Partnership
6120 South Yale, Suite 1700
Tulsa, Oklahoma 74136
(918) 492-1700
Attention: S. Lobaugh

James Bruce
Hinkle, Cox, Eaton,
Coffield & Hensley
500 Marquette, N.W.
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Albuquerque, N.M. 87102

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.)

This party requestd that the application for special pool rules be denied. Production history form the pool is limited and is insufficient to grant the relief requested. Also, the increased GOR may deplete the reservoir's pressure and energy. If the application is granted, the pool rules should be temporary for only six months, and that thereafter the rules be reviewed again.

PROPOSED EVIDENCE

APPLICANT

WITNESS (Name and expertise)	EST. TIME	EXHIBITS
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OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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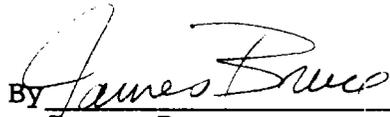
-None-

PROCEDURAL MATTERS

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

Respectfully Submitted,

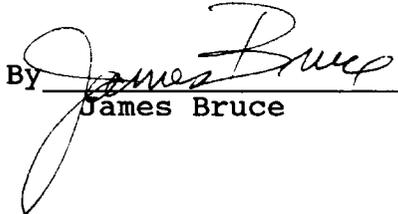
HINKLE, COX, EATON, COFFIELD &
HENSLEY

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James Bruce
500 Marquette, N.W.
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(505) 768-1500

Attorneys for R.C. Bennett

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was mailed this 8th day of February, 1991 to William F. Carr, P. O. Box 2208, Santa Fe, New Mexico 87504, and W. Thomas Kellahin, P. O. Box 2265, Santa Fe, New Mexico 87504.

BY 
James Bruce