

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

**IN THE MATTER OF:**

**APPLICATION OF PENDRAGON ENERGY  
PARTNERS, INC. and J.K. EDWARDS  
ASSOCIATES, INC. TO CONFIRM PRODUCTION  
FROM THE APPROPRIATE COMMON SOURCE  
OF SUPPLY, SAN JUAN COUNTY, NEW MEXICO.**

**CASE NO. 11996**

**PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Miller, Stratvert & Torgerson, P.A., attorneys for Applicants, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANTS**

Pendragon Energy Partners, Inc. and  
J. K. Edwards Associates, Inc.

**ATTORNEY**

J. Scott Hall, Esq.  
Miller, Stratvert & Torgerson, P.A.  
150 Washington Avenue, Suite 300  
P. O. Box 1986  
Santa Fe, New Mexico 87501  
(505) 989-9614

**INTERESTED PARTY**

Whiting Petroleum Corporation  
and  
Maralex Resources, Inc.

**ATTORNEY**

James Bruce, Esq.  
P. O. Box 1056  
Santa Fe, New Mexico 87504-1056  
(505) 982-2043

J. E. Gallegos, Esq.  
Gallegos Law Firm, P. C.  
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**STATEMENT OF THE CASE**

Applicants will appear and present testimony pursuant to the provisions of Rule 3 of the Special Rules and Regulations for the Basin-Fruitland Coal Gas pool, Order No. R-8768 as amended and 19 NMAC, Section 15.N.303.A preparatory to the issuance by the Division of an order, among other things, confirming that the applicant's wells completed within the vertical limits of the WAW Fruitland-Pictured Cliffs pool and that the wells owned and operated by Whiting Petroleum Corporation and Maralex Resources, Inc. completed in the Basin-Fruitland Coal Gas Pool are producing from the appropriate common source of supply and providing such other relief - as the Division determines appropriate. Applicants will also ask the Division to address the claimed violations of the New Mexico Oil and Gas Act and the Division's Rules, Regulations and Orders.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Al Nicol, Geologist	45 minutes	Approximately 5
Ken Ancell, Petroleum Engineer	25 minutes	Approximately 4
Jack McCartney, Petroleum Engineer	45 minutes	Approximately 5
Roland Blauer, Petroleum Engineer	45 minutes	Approximately 6
Keith Edwards, Landman	20 minutes	Approximately 3

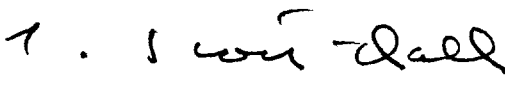
**PROCEDURAL MATTERS**

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

Whiting/Maralex Motion To Dismiss Application For Lack of Jurisdiction.

Whiting/Maralex Motion to Quash Subpoena Duces Tecum.

MILLER, STRATVERT & TORGERSON, P.A.

By   
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**Certificate of Mailing**

I hereby certify that a true and correct copy of the foregoing was mailed to counsel of record on the 19th day of June, 1998 as follows:

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