

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

**APPLICATION OF PURE RESOURCES, L.P.  
FOR COMPULSORY POOLING, LEA  
COUNTY, NEW MEXICO**

**CASE NO. 13303**

**APPLICANT'S PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Pure Resources, L.P.  
500 West Illinois  
Midland, TX 79701

**ATTORNEY**

Michael H. Feldewert, Esq.  
Holland & Hart LLP  
P.O. Box 2208  
Santa Fe, NM 87504  
505-988-4421

**OPPONENT**

None.

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None.

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**APPLICANT'S STATEMENT OF CASE**

Applicant in the above-styled cause seeks an order pooling all uncommitted mineral interests in all formations from the surface to the base of the Pennsylvanian formation in the W/2 of Section 24, Township 26 South, Range 34 East, N.M.P.M. to form a standard 320-acre gas spacing and proration unit for all formations and/or pools developed on 320-acres within that vertical extent. Said unit is to be dedicated to applicant's proposed Madera "24" Federal Well No. 1 to be drilled as a wildcat gas well at a standard location in SW/4 (Unit M) said Section 24, at a point 1310 feet from the south line and 1310 feet from the west line to a depth sufficient to test the Morrow formation. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as

operator of the well and a charge for risk involved in drilling said well. Said area is located approximately 18 miles southwest of Jal, New Mexico.

**APPLICANT'S PROPOSED EVIDENCE**

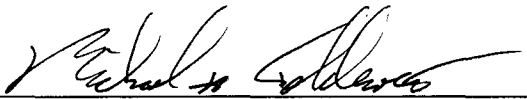
WITNESSES (Name and Expertise)	ESTIMATED TIME	EXHIBITS
Robert Ready (Land)	Approx. 15 Minutes	Approx. 6

**PROCEDURAL MATTERS**

No other party has entered an appearance at this time and applicant is not aware of any procedural issues at this time.

Respectfully submitted,

HOLLAND & HART, LLP

By: 

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Attorneys for Pure Resources, L.P.