

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

IN THE MATTER OF THE APPLICATION OF
HEC PETROLEUM, INC. TO AMEND THE
SPECIAL RULES AND REGULATIONS FOR
THE CINTA ROJA-MORROW GAS POOL
LEA COUNTY, NEW MEXICO

CASE NO. 13300

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Miller Stratvert P.A. (J. Scott Hall) on behalf of Robert E. Landreth, as required by the Oil Conservation Division.

APPEARANCES

APPLICANT'S ATTORNEY

James G. Bruce, Esq.
Post Office Box 1056
Santa Fe, New Mexico 87504-1056

APPLICANT

HEC Petroleum, Inc.

OPPONENT'S ATTORNEY

J. Scott Hall, Esq.
Miller Stratvert P.A.
Post Office Box 1986
Santa Fe, New Mexico 87504

OPPONENT

Robert E. Landreth

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order amending the special rules and regulations for the Cinta Roja-Morrow Gas Pool to provide for 640-acre well units, four wells per well unit with no more than one well per quarter section, wells to be located no closer than 660 feet to a quarter section line

cc'd
CD
7/8/04

nor closer than 10 feet to a quarter-quarter section line or subdivision inner boundary, and one operator per well unit. The subject pool covers Sections 4, 8, 9, and 10, Township 24 South, Range 35 East.

OPPOSITION OR OTHER PARTY

Landreth is the owner of certain oil and gas leasehold working interests located within the boundaries of the Cinta Roja-Morrow Gas Pool that is the subject of the Application in this matter. The information set forth in the Application is not sufficient to allow Landreth to fully assess the implications of the proposal to increase drilling densities from one well to four wells per unit within the pool. Landreth has made repeated efforts to discuss the proposal with HEC's land staff and its engineering staff, but for various reasons, Landreth has been unable to make contact with knowledgeable individuals. As a consequence, Landreth has been unable to determine whether he supports or opposes the Application.

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	NO. OF EXHIBITS
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OPPOSITION

WITNESSES	EST. TIME	NO. OF EXHIBITS
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None

PROCEDURAL MATTERS

A Motion for Continuance has been filed on behalf of Mr. Landreth for the reasons stated above.

MILLER STRATVERT P.A.

By: J. Scott Hall

J. Scott Hall, Esq.
Post Office Box 1986
Santa Fe, New Mexico 87504
(505) 989-9614
Attorneys for Robert E. Landreth

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was faxed to counsel of record on the 2nd day of July, 2004, as follows:

James G. Bruce, Esq.
Post Office Box 1056
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J. Scott Hall
J. Scott Hall

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ENTRY OF APPEARANCE

Comes now ROBERT E. LANDRETH by and through his undersigned attorneys, Miller
Stratvert P.A., (J. Scott Hall) and hereby enters his appearance in the above cause.

MILLER STRATVERT P.A.

By:




J. Scott Hall
Attorneys for Robert E. Landreth
Post Office Box 1986
Santa Fe, New Mexico 87504-1986
(505) 989-9614

10/5/04
3/5/04

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was faxed to counsel of
record on the 30th day of June, 2004, as follows:

James G. Bruce, Esq.
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J. Scott Hall