



**MONTGOMERY  
& ANDREWS**  
LAW FIRM

J. SCOTT HALL

Cell: (505) 670-7362

Email: shall@montand.com

Reply To: Santa Fe Office

www.montand.com

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2011 APR 21 P 3:21

April 14, 2011

Ms. Florene Davidson  
New Mexico Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

**Hand Delivered**

**Re: NMOCD Case No. 14629: Application of Blue Dolphin Production LLC for  
an Unorthodox Well Location and Non-Standard Oil Spacing and Proration  
Unit, Rio Arriba County, New Mexico**

Dear Ms. Davidson:

On behalf of Blue Dolphin Production LLC, enclosed is an original and one copy  
of Blue Dolphin's Pre-Hearing Statement.

Very truly yours,

Karen Williams  
Assistant to J. Scott Hall

:kw  
Enclosure

cc: Blue Dolphin Production LLC  
00274271

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**REPLY TO:**

325 Paseo de Peralta  
Santa Fe, New Mexico 87501  
Telephone (505) 982-3873 • Fax (505) 982-4289

Post Office Box 2307  
Santa Fe, New Mexico 87504-2307

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6301 Indian School Road NE, Suite 400  
Albuquerque, New Mexico 87110  
Telephone (505) 884-4200 • Fax (505) 888-8929

Post Office Box 36210  
Albuquerque, New Mexico 87176-6210

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

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**IN THE MATTER OF THE APPLICATION OF  
BLUE DOLPHIN PRODUCTION, LLC FOR  
COMPULSORY POOLING, RIO ARRIBA  
COUNTY, NEW MEXICO**

**Case No. 14629**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by Blue Dolphin Production LLC as required by the Oil Conservation Division.

**APPEARANCES**

APPLICANT

Blue Dolphin Production LLC  
2922 Evergreen Parkway, Suite 309  
Evergreen, CO 80439-7915

APPLICANT'S ATTORNEY

J. Scott Hall  
Montgomery & Andrews  
P.O. Box 2307  
Santa Fe, New Mexico 87504-2307  
(505) 986-2646

OPPONENT

OPPONENT'S ATTORNEY

**STATEMENT OF THE CASE**

APPLICANT

Applicant seeks an order for the consolidation by compulsory pooling of all unjoined interests in all pools or formations developed on 40-acre spacing within the Mancos Shale formation underlying a previously approved non-standard oil well spacing and proration unit comprised of  $21.0 \pm$  acres located in the approximate E/2 SW/4 NE/4 of projected Section 27, Township 30 North, Range 1 East in Rio Arriba County, New Mexico. Included among these interests are an approximate 16.63125% unleased mineral interest acquired by the Jicarilla Apache Nation. The unit will be dedicated to the following well to be drilled to the Greenhorn member of the undesignated Mancos Shale formation,

Theis Greenhorn Test Well No. 1  
1643' FNL and 1575' FEL (G)  
Projected Section 27, T30N, R1E  
Rio Arriba County, New Mexico

OPPONENT

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

Dick Dolecek, Geological Engineer

30 minutes

7

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

**PROCEDURAL MATTERS**

None.

MONTGOMERY & ANDREWS, P.A.

By: J. Scott Hall

J. Scott Hall, Esq.

Post Office Box 2307

Santa Fe, New Mexico 87504

(505) 982-3873

Attorneys for Blue Dolphin Production LLC


00273006

**Certificate of Service**

I hereby certify that on April 21, 2011, a true and correct copy of the foregoing  
was mailed to the following:

Jim Lovato  
Farmington Field Office  
Bureau of Land Management  
1235 La Plata Highway, Suite A  
Farmington, NM 87401

Dixon Sandoval  
Jicarilla Apache Nation  
Jicarilla Oil & Gas Administration  
#6 Dulce Rock Road  
Dulce, NM 87528

  
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J. Scott Hall