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# 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:

APPLICATION OF MACK ENERGY CORPORATION FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

Case No. 14,763

## PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

#### APPEARANCES

**APPLICANT** 

Mack Energy Corporation

P.O. Box 960

Artesia, New Mexico 88211

Attention:

Staci Sanders

(575) 748-1288

**OPPONENT** Tom Ragsdale

APPLICANT'S ATTORNEY

James Bruce

P.O. Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

**OPPONENT'S ATTORNEY** 

## STATEMENT OF THE CASE

#### APPLICANT

Mack Energy Corporation seeks an order pooling all mineral interests from the surface to the base of the Abo formation underlying the SE1/NW1/4 of Section 32, Township 17 South, Range 33 East, N.M.P.M. The unit is dedicated to the Cockburn A State Well No. 5, an existing well to be re-completed in the Abo formation. Also to be considered will be the cost of re-completing the 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 200% charge for the risk involved in re-completing the well.

#### **OPPONENT**

# PROPOSED EVIDENCE

# **APPLICANT**

6: 44

<u>WITNESSES</u>

EST. TIME

**EXHIBITS** 

Staci D. Sanders

(landman)

15 min.

Approx. 5

# **OPPONENT**

**WITNESSES** 

EST. TIME

**EXHIBITS** 

# PROCEDURAL MATTERS

Mr. Ragsdale has requested a continuance. Applicant will respond to that request in the next two days.

Respectfully submitted,

James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attorney for Mack Energy Corporation

cc: tom Ragsdale (via fax)