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 THOMPSON ENGINEERING AND PRODUCTION CORPORATION FOR APPROVAL OF A UNIT AGREEMENT, SAN JUAN COUNTY, NEW MEXICO.

Case No. 14876

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT'S ATTORNEY

Thompson Engineering & Production Corporation James Bruce

P.O. Box 1056

7415 East Main Street Farmington, New Mexico 87402

Santa Fe, New Mexico 87504

(505) 982-2043

Attention:

Paul C. Thompson

(505) 327-4892

OTHER PARTY

OTHER PARTY'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks approval of the Unit Agreement for the PGA Exploratory Unit Area, comprising 8,436.83 acres of federal and state lands (covering the Fruitland Coal formation) in all or part of Sections 2-4, 8-10, and 16 in Township 23 North, Range 11 West, NMPM, and Sections 21, 22, 25-28, and 33-35 in Township 24 North, Range 11 West, NMPM.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

APPLICANT PLANS TO PRESENT THIS MATTER BY AFFIDAVIT.

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

//4 (2

Respectfully submitted,

James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attorney for Thompson Engineering and Corporation