

**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:**

CASE NO. 13509

**APPLICATION OF MARBOB ENERGY CORPORATION
FOR COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO.**

2005 JUN 10 AM 7 19

PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

Mr. Raye Miller
Marbob Energy Corporation
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ATTORNEY

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STATEMENT OF CASE

APPLICANT

Applicant in the above-styled cause seeks an order pooling all mineral interests from the top of the Atoka formation to the base of the Morrow formation in the all spacing and proration units located in the N/2 of Section 30, Township 18 South, Range 28 East, N.M.P.M., Eddy County, New Mexico for all formations and/or pools developed on 320-acre spacing which

includes but is not limited to the North Illinois Camp-Morrow Gas Pool. Said units are to be dedicated to its Nichols State Well No. 1 that has been drilled at a standard gas well location 1370 feet from the North line and 1500 feet from the East line (Unit G) of said Section 30. Also to be considered will be the designation of Marbob Energy Corporation as operator of the well and spacing units.

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and Expertise)

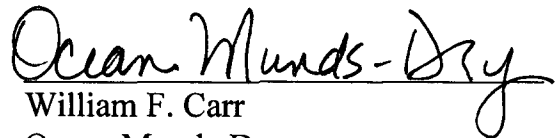
ESTIMATED TIME

EXHIBITS

BY AFFIDAVIT.

PROCEDURAL MATTERS

Marbob Energy Corporation will submit this application pursuant to the alternative procedure authorized by Oil Conservation Division Rules 1207 1 (b)



William F. Carr

Ocean Munds-Dry

Attorneys for Marbob Energy Corporation