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August 19, 2014

**VIA ELECTRONIC MAIL ONLY**

**florene.davidson@state.nm.us**

Jami Bailey, Division Director  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

**Re: Oil Conservation Division Case No. 15191**

Dear Ms. Bailey:

Yesterday, a copy of the attached Pre-Hearing Statement was provided to us by Gabrielle Gerholt of Holland and Hart. The Pre-Hearing Statement represents that I am attorney for Chuza Oil Company in the above referenced proceeding. Although, I am counsel for Chuza Oil Company in other matters, I have not been authorized nor does Chuza Oil Company wish to participate in this matter.

Accordingly, please delete my name as counsel for Chuza Oil Company in case number 15191.

Please let me know if you have any questions.

Very truly yours,



ERNEST L. PADILLA

ELP:jbg

Enclosure as stated

cc: James Bruce  
Michael Feldewert  
Gabrielle Gerholt  
Michael Condon  
Gabe Wade  
Karin V. Foster  
Gene Gallegos

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 TO AMEND ORDER NO. R-12984  
TO REMOVE CERTAIN ACREAGE FROM THE  
BASIN-MANCOS GAS POOL (97232), ETC.,  
MCKINLEY, RIO ARRIBA, SAN JUAN, AND SANDOVAL  
COUNTIES, NEW MEXICO.

Case No. 15191

ENTRY OF APPEARANCE AND PRE-HEARING STATEMENT

James Bruce enters his appearance in this case on behalf of Enervest Operating, LLC.

This pre-hearing statement is submitted by Enervest Operating, LLC as required by the  
Oil Conservation Division.

APPEARANCES

APPLICANT

ConocoPhillips Company, *et al.*

Logos Resources, LLC

OTHER PARTIES

Benson-Montin-Greer Drilling Corp.

Oil Conservation Division

Chuzá Oil Co.

Hart Oil & Gas, Inc.

IPANM

APPLICANT'S ATTORNEY

Michael Feldewert  
Gabrielle Gerholt

J. Scott Hall

OTHER PARTIES' ATTORNEYS

Gene Gallegos  
Michael Condon

Gabe Wade

Ernest L. Padilla

Kirk Kennedy

Karin V. Foster

Enervest Operating LLC  
Suite 800  
1001 Fannin Street  
Houston, Texas 77002

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attention: Christopher Jeffus

## STATEMENT OF THE CASE

### APPLICANT

### OTHER PARTIES

Enervest Operating, LLC approves of the application, but desires to include the following additional acreage in the application:

26N-3W - Sections 5, 6, 7, 8, 17, 18, 19, 20  
26N-4W - Sections 1 through 24  
26N-5W - Sections 1 through 24  
26N-6W - Sections 1, 12, 13, 24  
30N-12W - Sections 5, 6, 7, 8, 17, 18, 19, 20, 29, 30, 31, 32  
31N-12W - Sections 5, 6, 7, 8, 17, 18, 19, 20, 29, 30, 31, 32  
32N-12W - Sections 7, 8, 17, 18, 19, 20, 29, 30, 31, 32  
30N-13W - Sections 1, 2, 3, 4, 9, 10, 11, 12  
31N-13W - Sections 25, 26, 27, 28, 33, 34, 35, 36

## PROPOSED EVIDENCE

### APPLICANT

#### WITNESSES

#### EST. TIME

#### EXHIBITS

### OTHER PARTIES

#### WITNESSES

#### EST. TIME

#### EXHIBITS

Christopher Jeffus  
(landman)

10 minutes

Approx. 2

Callie Zazzi  
(engineer)

10 minutes

Approx. 2

PROCEDURAL MATTERS

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "James Bruce", is written over a horizontal line.

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Enervest Operating, LLC

cc: Counsel of record via e-mail