

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

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IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION FOR  
THE PURPOSE OF CONSIDERING:

APPLICATION OF SOVEREIGN EAGLE, LLC  
FOR COMPULSORY POOLING, ROOSEVELT  
COUNTY, NEW MEXICO.

Case No. 15,224

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by R.B. Cowden Family Properties Limited as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Sovereign Eagle, LLC

**APPLICANT'S ATTORNEY**

J. Scott Hall

**OPPONENT**

R.B. Cowden Family Properties Limited  
Midland, Texas 79701

**OPPONENT'S ATTORNEY**

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

Attention: Tyler Nobles  
(432) 218-8414

**STATEMENT OF THE CASE**

**APPLICANT**

Applicant seeks to force pool uncommitted interests in the Stoltenberg Well No. 2, located in the N/2 of Section 26, Township 2 South, Range 29 East, N.M.P.M.

**OPPONENT**

R.B. Cowden Family Properties Limited opposes the application because applicant has not followed established Division procedures which are necessary to show good faith negotiations. The application should be dismissed.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

Tyler Nobles or  
Elaine Magruder

10 min.

Approx. 2

**PROCEDURAL MATTERS**

Respectfully submitted,



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

Attorney for R.B. Cowden Family  
Properties Limited

CERTIFICATE OF SERVICE

The foregoing pleading was served upon the following counsel of record this 26<sup>th</sup> of  
November, 2014 via e-mail:

J. Scott Hall  
Montgomery & Andrews, P.A.  
325 Paseo de Peralta  
Santa Fe, New Mexico 87501  
[shall@montand.com](mailto:shall@montand.com)



James Bruce