

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

**IN THE MATTER OF THE APPLICATION
OF McELVAIN OIL & GAS PROPERTIES, INC.
FOR COMPULSORY POOLING,
SAN JUAN, NEW MEXICO**

**CASE NO. 13605
CASE NO. 13606
CASE NO. 13607**

APPLICANT'S PRE-HEARING STATEMENT

Applicant hereby submits this Pre-Hearing Statement pursuant to the rules of the
Oil Conservation Division.

APPEARANCES

APPLICANT

McElvain Oil & Gas Properties, Inc.
Attn: Denise Greer
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ATTORNEY

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OPPONENT

Lance Oil & Gas Company
Denver, Colorado

OPPONENT'S ATTORNEY

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APPLICANT'S STATEMENT OF CASE

In Case Nos. 13605, 13606 and 13607, Applicant seeks orders pooling all uncommitted mineral interests in all formations from the surface to the base of the Pictured Cliffs underlying, respectively, the NE/4, the SW/4 and the SE/4 of Section 5, Township 29 North, Range 13 West, N.M.P.M., San Juan County, New Mexico to form standard 160-acre gas spacing and proration units for the Fulcher Kutz Pictured Cliffs

Gas Pool and all formations and/or pools developed on 160-acre spacing within that vertical extent. These units are to be dedicated to applicant's proposed Wildwood No. 1, Wildwood No. 4 and Wildwood No. 2 wells to drilled at standard gas well locations in each of these quarter sections. Also to be considered at the hearing will be the cost of drilling and completing said wells and the allocation of the costs thereof, the actual operating costs and charges for supervision, designation of applicant as operator of the wells, and a charge for risk involved in drilling said wells. This area is located approximately a half mile north of the airport in Farmington, New Mexico.

APPLICANT'S PROPOSED EVIDENCE

WITNESS (Name and Expertise)	ESTIMATED TIME	EXHIBITS
Denise Greer (landman)	Approx. 15 minutes	Approx. 6

PROCEDURAL MATTERS

McElvain Oil & Gas Properties, Inc., suggests that Case Nos. 13605, 13606 and 13607 be consolidated for purposes of hearing since the presentation will be basically the same for each matter. McElvain has met with Lance Oil & Gas, who is a successor to the interests held by Alamo Development Company in these wells, and understands that Lance is in the process of considering its position on these applications.

Respectfully submitted,

HOLLAND & HART, LLP

By: 

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**Attorneys for McElvain Oil & Gas
Properties, Inc.**