2017 NOV 22 P 2: 31

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

APPLICATION OF GREAT WESTERN DRILLING LTD. FOR A NON-STANDARD OIL SPACING AND PRORATION UNIT AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

**CASE NO. 15875** 

## PRE-HEARING STATEMENT

Great Western Drilling Ltd. and Great Western Drilling Company ("Great Western"), provides this Pre-Hearing Statement as required by the rules of the Division.

#### **APPEARANCES**

**GREAT WESTERN DRILLING COMPANY'S** 

GREAT WESTERN DRILLING LTD. AND GREAT WESTERN

DRILLING COMPANY

J. Scott Hall, Esq.

**ATTORNEY** 

MONTGOMERY & ANDREWS, P.A.

P.O. Box 2307

Santa Fe, NM 87504-2307

(505) 982-3873 shall@montand.com

#### OPPONENT/OTHER PARTIES

#### **OPPONENT'S ATTORNEY**

TIM S. CASHON, JOHN R.

James Bruce

DELANEY and ALLENCRESTNM I

Post Office Box 1056 Santa Fe, NM 87504

jamesbruc@aol.com

MEWBOURNE OIL COMPANY

James Bruce

Post Office Box 1056 Santa Fe, NM 87504 jamesbruc@aol.com CHISHOLM ENERGY OPERATING, LLC

Michael H. Feldewert
Jordan L. Kessler
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, NM 87504-2208
mfeldewert@hollandhart.com
jlkessler@hollandhart.com

## STATEMENT OF THE CASE

Applicant Great Western Applicant seeks an order (1) approving a non-standard oil spacing and proration unit in the Bone Spring formation comprised of the W/2W/2 of Section 34, Township 21 South, Range 34 East, NMPM, Lea County, New Mexico, and (2) pooling all mineral interests in the Bone Spring formation underlying the non-standard unit.

## PROPOSED EVIDENCE

APPLICANT'S WITNESSES	EST. TIME	<b>EXHIBITS</b>
Carter Muire, Land Tom Magee, Land (Alternate)	15 min.	5
Russell Rich, Geologist Terry Worthington, Geologist (Alternate)	15 min.	4
OPPONENT'S WITNESSES	EST. TIME	<b>EXHIBITS</b>

#### PROCEDURAL MATTERS

The parties may request a special hearing date or a continuance at the suggestion of the Division.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By:\_

J. Scott Hall

Seth C. McMillan

Post Office Box 2307

Santa Fe, New Mexico 87504-2307

(505) 982-3873

shall@montand.com

smcmillan@montand.com

Attorneys for Great Western Drilling Ltd. and Great Western Drilling Company

1. Swon dall

# **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on November 22, 2017:

James Bruce Post Office Box 1056 Santa Fe, NM 87504 jamesbruc@aol.com

J. Scott Hall