

**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. 13780**

**APPLICATION OF UNIT PETROLEUM  
COMPANY FOR COMPULSORY POOLING  
AND APPROVAL OF A NON-STANDARD GAS  
SPACING AND PRORATION UNIT, LEA  
COUNTY, NEW MEXICO.**

**PRE-HEARING STATEMENT**

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

*WJD 9/11/06*

**APPEARANCES OF PARTIES**

**APPLICANT**

UNIT PETROLEUM COMPANY

**ATTORNEY**

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

**OPPOSITION**

HOG PARTNERSHIP L.P.

**ATTORNEY**

Ocean Munds-Dry, Esq.  
Holland & Hart LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421

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**STATEMENT OF CASE**

OPPOSITION

HOG Partnership L.P. owns a working interest in the N/2 of Section 17, Township 20 South, Range 36 East, NMPM that Unit Petroleum Co. seeks to pool. HOG Partnership, L.P. opposes this application because Unit Petroleum Co. did not undertake good faith efforts to reach voluntary agreement with HOG Partnership L.P. for the development of the subject spacing units. The evidence will show that Unit Petroleum has not made a sufficient, good faith effort to obtain HOG Partnership's participation in the proposed well.

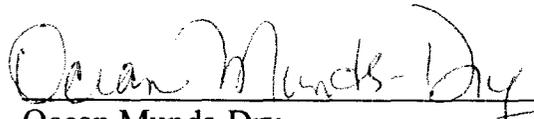
**PROPOSED EVIDENCE**

OPPOSITION

<b>WITNESSES</b> (Name and Expertise)	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Sue Raby, Land Manager	Approx. 30 min.	Approx. 8

**PROCEDURAL MATTERS**

HOG Partnership, L.P. has none at this time.

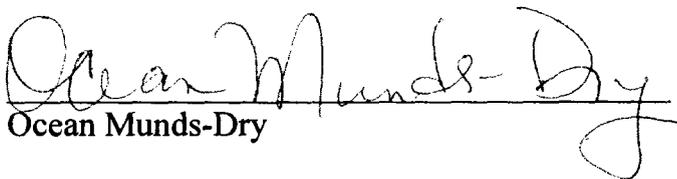
  
Ocean Munds-Dry  
Attorney for HOG Partnership, L.P.

**CERTIFICATE OF SERVICE**

I certify that on September 7, 2006, I served a copy of the foregoing document to the following by

- U.S. Mail, postage prepaid
- Hand Delivery
- Fax
- Electronic Service by LexisNexis File & Serve

Jim Bruce, Esq.  
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Ocean Munds-Dry