

**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 OF PRIDE ENERGY COMPANY  
FOR COMPULSORY POOLING, LEA COUNTY,  
NEW MEXICO.**

**Case No. 13,825**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by Pride Energy Company as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Pride Energy Company  
P.O. Box 701950  
Tulsa, Oklahoma 74170

Attention: John Pride  
(918) 524-9200

**APPLICANT'S ATTORNEY**

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

**OPPONENT**

**OPPONENT'S ATTORNEY**

**STATEMENT OF THE CASE**

**APPLICANT**

Applicant seeks an order pooling all mineral interests from the surface to the base of the North Bagley-Permo Pennsylvanian Pool underlying the following described acreage in Section 9, Township 11 South, Range 33 East, N.M.P.M., and in the following manner: The N/2NE/4 to form a standard 80 acre oil spacing and proration unit for all formations developed on 80 acre spacing within that vertical extent, including the North Bagley-Permo Pennsylvanian Pool; and the NE/4NE/4 to form a standard 40-acre oil spacing and proration unit for all formations developed on 40 acre spacing within that vertical extent. The units will be dedicated to the plugged and abandoned Bagley Well No. 1, located 560 feet from the north and east lines of Section 9, which will be re-entered to test the North Bagley-Permo Pennsylvanian Pool. In the event the re-entry of the Bagley Well No. 1 is not successful, the units will be dedicated to the

\*Bagley Well No. 3, to be drilled at an orthodox location in the N½NE¼ of Section 9 to test the North Bagley-Permo Pennsylvanian Pool. Also to be considered will be the cost of re-entering or drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in re-entering or drilling and completing the well.

OPPONENT

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES

EST. TIME

EXHIBIT

Pursuant to Division Rule 1207.A(1), this application will be submitted by affidavit.

OPPONENT

WITNESSES

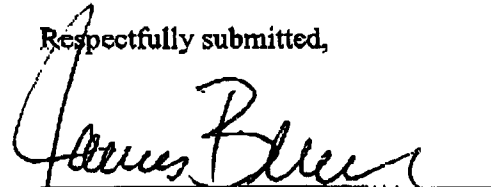
EST. TIME

EXHIBITS

**PROCEDURAL MATTERS**

-None-

Respectfully submitted,



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

Attorney for Pride Energy Company