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

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

APPLICATION OF PARALLEL PETROLEUM CORPORATION FOR COMPULSORY POOLING, CHAVES COUNTY, NEW MEXICO

CASE 13963

PRE-HEARING STATEMENT

Parallel Petroleum Corporation. submits this pre-hearing statement as required by the New Mexico Oil Conservation Division.

APPEARANCES OF THE PARTIES

APPLICANT

ATTORNEY

Parallel Petroleum Corp. P.O. Box 10587 Midland, TX 79702 Attn: Mike Gray 432-349-7033 Thomas Kellahin, Esq. 706 Gonzales Road Santa Fe, New Mexico 87501 505-982-4285

OPPONENT

ATTORNEY

none

STATEMENT OF THE CASE

APPLICANT:

PARALLEL PETROLEUM CORPORATION ("Parallel"), and in accordance with Section 70-2-17(c) NMSA (1978), applies to the New Mexico Oil Conservation Division for an order pooling all mineral interests from the surface to the base of the Wolfcamp formation underlying the following described acreage in Section 8, T15S, R25E, NMPM, in the following manner: the N/2 to form a standard 320-acre gas spacing and proration unit for any and all formations and/or pools developed on 320-acre gas spacing within that vertical extent. This unit is to be dedicated to its Giacomo 1525-8 Federal Com Well No. 1 (API#30-005-63946) which will be located at an unorthodox surface location 760 feet FNL and 208 feet FEL (Unit A) and deviated so that when the wellbore penetrates the Wolfcamp formation it will be at a standard subsurface location, 660 feet FEL and 760 feet FNL Unit A) then drilled horizontally in a westerly direction staying within a producing area 660 feet from each of the end and side boundaries of this spacing unit and ending at a standard bottom hole location 760 feet FNL and 660 feet FWL (Unit D). Also to be considered will be the costs of drilling and completing this well and the allocation of the costs thereof as well as actual operating costs and charges for supervision, designation of the applicant as the operator of the well and a 200% charge for risk involved in this well.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EST. EXHIBITS

Mike Gray (Consulting landman)

15-20 min

about 8

PROCEDURAL MATTERS

None

1 All

W. Thomas Kellahin 766 Gonzales Road

Santa Fe, New Mexico 87501

KEĽLAHIN& KELLAHIN

Phone 505-982-4285 Fax 505-982-2047

E-mail: tkellahin@comcast.net

NMOCD Case 13963
Parallel Petroleum Corp's Pre-Hearing Statement
Page 2