

**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  
TO REINSTATE ORDER NO. R-12,713 FOR  
COMPULSORY POOLING, LEA COUNTY,  
NEW MEXICO.**

**Case No. 13,825 (reopened)**

**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: Matthew 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 S/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 SW/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 are to be dedicated to the Bagley Well No. 2, to be drilled at an approved unorthodox oil well location 1905 feet from the north line and 2130 feet from the east line of Section 9. Also to be considered will be the cost of

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 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

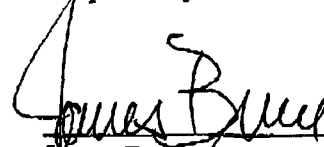
EST. TIME

EXHIBITS

**PROCEDURAL MATTERS**

Applicant will present the case, but the case has been re-advertised for the September 20<sup>th</sup> hearing because the proper case/order numbers are Case No. 13824 and Order No. R-12712.

Respectfully submitted,



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

Attorney for Pride Energy Company