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 HEARING:

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

CASE 13985

(W VJT 9/ 2/2)

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 seeks an order pooling all mineral interests from the surface to the base of the Wolfcamp formation underlying the following described acreage in Section 28, 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 Native Dancer1525-8 Well No. 1 (API#30-005-63916) which will be located at an unorthodox surface location 760feet FNL and 168 feet FWL (Unit D) and deviated so that when the wellbore penetrates the Wolfcamp formation it will be at a standard subsurface location, 760 feet FNL and 660 feet FWL Unit D) then drilled horizontally in an easterly 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 FEL (Unit A). Also to be considered will be the costs of drilling and completing this well and the allocation 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

15-20 min

EST. EXHIBITS

about 8

Aaron Myers (Consulting landman)

PROCEDURAL MATTERS

None

KELLÄHIN⁄& KELLAHIN

W. Thomas Kellahin 706 Gonzales Road Santa Fe, New Mexico 87501 Phone 505-982-4285 Fax 505-982-2047 E-mail: tkellahin@comcast.net

NMOCD Case 13985 Parallel Petroleum Corp's Pre-Hearing Statement Page 2