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

CASE NO. 13916

PRE- HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Aaron Myers Parallel Petroleum Corporation P.O. Box 10587 Midland, TX 79702 (432) 688-3699 Kristina Martinez, Esq. Holland & Hart LLP Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421

STATEMENT OF CASE

APPLICANT

Applicant seeks amendment to Order R-12780 pooling all mineral interests from the surface to the base of the Wolfcamp formation in the spacing and proration units located in the S/2 of Section 28, Township 15 South, Range 25 East, N.M.P.M., Chaves County, New Mexico. Said unit was dedicated to Parallel's Unbridled 152528 Well No. 1 to be drilled at a surface location 1880 feet from the South line and 237 feet from the East line and a bottomhole location 1880 feet from the South line and 660 feet from the East line of Section 28, Township 15 South, Range 25 East, NMPM, Chaves County, New Mexico to an approximate depth of 4750 feet to test any and all formations from the surface to the base of the Wolfcamp formation. Parallel seeks an order amending Order R-12780 to

include certain interest owners inadvertently left out of the original pooling application. Said area is located 5 miles southwest of Lake Arthur, New Mexico.

PROPOSED EVIDENCE

<u>WITNESSES</u>

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ESTIMATED TIME

EXHIBITS

By Affidavit

PROCEDURAL MATTERS

Parallel Petroleum Corporation has none at this time.

Respectfully submitted,

HOLLAND & HART LLP

Munds-Dry By: Illiam F. Carr

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ATTORNEYS FOR PARALLEL PETROLEUM CORPORATION

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