# REGEIVED

# STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCESDEPARTMENTO OIL CONSERVATION DIVISION

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

# APPLICATION OF LYNX PETROLEUM CONSULTANTS, CASE NO. 14263 INC. FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO

#### **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**

Larry Scott Lynx Petroleum Consultants, Inc. P.O. Box 1708 Hobbs, NM 88240 (505) 392-6950 Ocean Munds-Dry, Esq. Holland & Hart LLP Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421

#### STATEMENT OF CASE

#### APPLICANT

Applicant in the above-styled cause seeks an order pooling all mineral interests in a 320acre spacing unit located in the W/2 of Section 28, Township 20 South, Range 30 East, N.M.P.M., Eddy County, New Mexico. The above-referenced spacing unit will be dedicated to Lynx's Emperor Oil Co Fed Gas B Com Well No. 1 which will be recompleted to the Strawn formation, Golden Lane Strawn Gas Pool, from a location 1980 feet from the North and West lines of said Section 28. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of Lynx Petroleum Consultants, Inc. as operator of the well and a charge for risk involved in drilling said well. Said area is located approximately 15 miles east-northeast of Carlsbad, New Mexico.

## **PROPOSED EVIDENCE**

**WITNESSES** 

# ESTIMATED TIME

**EXHIBITS** 

Larry Scott Landman 20 Minutes

10

## **PROCEDURAL MATTERS**

Lynx Petroleum Consultants, Inc. has none at this time.

Respectfully submitted,

HOLLAND & HART LLP

ACH Bv

Ocean Munds-Dry Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421 (505) 983-6043 Facsimile

ATTORNEY FOR Lynx Petroleum Consultants, Inc.

4416011\_1.DOC