# 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 TORCH ENERGY ADVISORS INCORPORATED FOR APPROVAL OF A UNIT AGREEMENT, ROOSEVELT COUNTY, NEW MEXICO

CASENO.74495

### PRE- HEARING STATEMENT

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

#### APPEARANCES OF PARTIES

## **APPLICANT**

Keith Turner Torch Energy Advisiors Incorporated 1331 Lamar, Suite 1450 Houston, TX 77010 (713) 753-1204

## **ATTORNEY**

Ocean Munds-Dry Holland & Hart LLP Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421

#### STATEMENT OF CASE

#### **APPLICANT**

Applicant seeks approval of the San Juan Mesa 4-30 Exploratory Unit from the surface to the base of the Fusselman-Montoya formation in an area comprising 9160 acres of State of New Mexico and Fee lands in Sections 1,3, 9, 10, 11, 12, 14, 15, 16, 17, 20, 21, 22, 23, 26, 27, 28 and 29 in Township 4 South, Range 30 East, NMPM, which is located approximately 12 miles West of Elida, New Mexico.

## PROPOSED EVIDENCE

**WITNESSES** 

**ESTIMATED TIME** 

**EXHIBITS** 

By Affidavit

### PROCEDURAL MATTERS

Torch Energy Advisors Incorporated has none at this time.

Respectfully submitted,

HOLLAND & HART LLP

Ocean Munds-Dry Post Office Box 2208

Santa Fe, New Mexico 87504

(505) 988-4421

(505) 983-6043 Facsimile

**ATTORNEY FOR** 

TORCH ENERGY ADVISORS INCORPORATED