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 NADEL AND GUSSMAN PERMIAN, L.L.C. FOR APPROVAL OF A UNIT AGREEMENT, CHAVES COUNTY, NEW MEXICO.

Case No. 14622

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Nadel and Gussman Permian, LLC

Suite 508

601 North Marienfeld

Midland, Texas 79701

Attention:

Emerald Johnson

(432) 682-4429

OPPONENT

OPPONENT'S ATTORNEY

APPLICANT'S ATTORNEY

Santa Fe, New Mexico 87504

James Bruce

P.O. Box 1056

(505) 982-2043

STATEMENT OF THE CASE

APPLICANT

Applicant seeks approval of the Unit Agreement for the South Tobac Unit Area, comprising 1280.00 acres of state lands comprising the W/2 of Section 28, all of Section 29, and the E/2 of 30, Township 8 South, Range 33 East, NMPM.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

Doug Laufer (landman)

David Andrews (geologist)

THIS MATTER WILL BE SUBMITTED BY AFFIDAVIT.

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

-None-

Respectfully submitted,

James Bruce

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Attorney for Nadel and Gussman Permian, LLC