

**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:

CASE NO. 11385

APPLICATION OF TEXACO EXPLORATION  
AND PRODUCTION INC., FOR AN  
UNORTHODOX LOCATION,  
EDDY COUNTY, NEW MEXICO.

**PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Campbell, Carr & Berge, P.A., as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

**ATTORNEY**

Texaco Exploration and Production Inc.  
c/o Ronald W. Lanning  
Post Office Box 3109  
Midland, TX 79702  
(915) 688-4831

William F. Carr, Esq.  
Campbell, Carr & Berge, P.A.  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421

name, address, phone and  
contact person

**INTERESTED PARTY**

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**STATEMENT OF CASE**

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

Texaco Exploration and Production Inc., applicant in the above-styled cause, seeks approval to drill its Dow "B-28" Federal Well No. 1 at an unorthodox location 1028 feet from the South line and 1227 feet from the East line (Unit P) of Section 28, Township 17 South, Range 31 East, to test for oil in the deeper Siluro-Devonian formation and for gas in the Undesignated East Cedar Lake-Morrow Gas Pool. The SE/4 SE/4 of said Section 28 is to be dedicated to said well to form a standard 40-acre oil spacing and proration unit and the S/2 of said Section 28 to form a standard 320-acre gas spacing and proration unit.

OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

**PROPOSED EVIDENCE**

APPLICANT

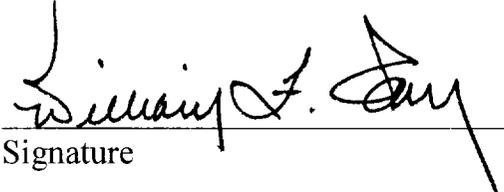
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Bob Heinke, Geologist	10 Min.	Approximately 4

OTHER PARTY

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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**PROCEDURAL MATTERS**

(Please identify any procedural matters which need to be resolved prior to hearing)

  
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Signature