

**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 THOMPSON ENGINEERING
& PRODUCTION COMPANY, FOR AN
OFF PATTERN COAL/GAS WELL LOCATION,
SAN JUAN COUNTY, NEW MEXICO.

CASE NO. 1172⁸

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by TEXAKOMA OIL & GAS CORPORATION, as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

ATTORNEY

Thompson Engineering

William F. Carr

INTERESTED PARTY

ATTORNEY

Texakoma Oil & Gas Corp.
5400 LBJ Freeway, Suite 500
Dallas, Texas 75240
Attn: David Williams
(972) 701-9106

W. Thomas Kellahin
KELLAHIN & KELLAHIN
P.O. Box 2265
Santa Fe, NM 87504
(505) 982-4285

TEXAKOMA'S
STATEMENT OF CASE

Texakoma requests that the Division deny Thompson's application for an off pattern coal-gas well location because a suitable **on pattern location** is available to Thompson.

Texakoma's requested **off pattern location** unnecessarily encroaches upon Texakoma's well location and if approved, will simply cause wells to be located too close together thereby causing waste and violating correlative rights.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES

Brad Salzman (P.E.)

EST. TIME EXHIBITS

60 Min

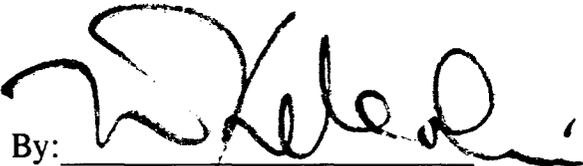
@ 16 exhibits

I hope this isn't true!

PROCEDURAL MATTERS

None pending at this time

KELLAHIN AND KELLAHIN



By:

W. Thomas Kellahin

P.O. Box 2265

Santa Fe, New Mexico 87504

(505) 982-4285