

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

**APPLICATION OF AMERIND OIL COMPANY, LTD.
FOR COMPULSORY POOLING
AND A NON-STANDARD PRORATION UNIT,
LEA COUNTY, NEW MEXICO.**

CASE NO. 11754

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by AMERIND OIL COMPANY, LTD., as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT IN CASE 11754

ATTORNEY

Amerind Oil Company, Ltd.
415 West Wall Street
Midland, Texas 79701
(915) 682-8217
attn: Bob Leibrock

W. Thomas Kellahin
KELLAHIN & KELLAHIN
P.O. Box 2265
Santa Fe, NM 87504
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STATEMENT OF CASE

Pursuant to Section 70-2-17(c) NMSA (1978) and in order to obtain its just and equitable share of potential production underlying N/2SE/4 of Irregular Section 3, T16S, R35E, Amerind Oil Company, Ltd. needs an order of the Division pooling the identified and described mineral interests involved in order to protect correlative rights and prevent waste.

Amerind requests an order pooling the mineral interest of described in this spacing unit for the drilling of a well at a standard well location in the N/2SE/4 of Irregular Section 3 for potential production from the West Lovington-Strawn Pool upon terms and conditions which include:

- (1) Amerind Oil Company, Ltd. be named operator;

- (2) The order make provisions for applicant and all working interest owners to participate in the costs of drilling, completing, equipping and operating the well;
- (3) In the event a working interest owner fails to elect to participate, then provision be made to recover out of production, the costs of the drilling, completing, equipping and operating the well, including a risk factor penalty of 200 %;
- (4) A provision for overhead rates and a method for adjusting those rates in accordance with COPAS accounting procedures;
- (5) For such other and further relief as may be proper.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES	EST. TIME	EXHIBITS
Ralph Lee (landman)	15 Min.	@ 6 exhibits
Robert C. Leibrock petroleum engineer	15 min.	@ 3 exhibits

PROCEDURAL MATTERS

None

KELLAHIN AND KELLAHIN

By: 

W. Thomas Kellahin