

Court to 9/4

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

RECEIVED

SEP 1 1997

Oil Conservation Division

APPLICATION OF GILLESPIE-CROW, INC.  
TO AMEND ORDER NO. R-10448-A AND  
TO AMEND THE SPECIAL POOL RULES  
FOR THE WEST LOVINGTON-STRAWN POOL,  
LEA COUNTY, NEW MEXICO.

CASE 11827

PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Gillespie Crow, Inc. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

James Bruce, Esq.  
612 Old Santa Fe Trail, Suite B  
Santa Fe, New Mexico 87501  
(505) 982-2043

name, address, phone and  
contact person

INTERESTED PARTY

ATTORNEY

Yates Petroleum Corporation  
c/o David Boneau  
105 South Fourth Street  
Artesia, NM 88210  
(505) 748-1471

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

**Pre-hearing Statement**  
**NMOCD Case No. 11827**  
**Page 2**

INTERESTED PARTY

Hanley Petroleum Corporation  
c/o Jim Rogers

ATTORNEY

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

INTERESTED PARTY

Enserch Exploration, Inc.

ATTORNEY

J. Scott Hall, Esq.  
Miller, Stratvert, Torgerson  
& Schlenker, P.A.  
125 Lincoln Ave., Suite 221  
Santa Fe, New Mexico 87504  
(505) 989-9614

INTERESTED PARTY

Snyder Ranches, Inc.

ATTORNEY

W. Thomas Kellahin, Esq.  
Kellahin & Kellahin  
Post Office Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285

**STATEMENT OF CASE**

**APPLICANT**

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

**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.)

Yates Petroleum Corporation and Hanley Petroleum, Inc. will appear and present testimony in opposition to the application filed on behalf of Gillespie-Crow, Inc.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
-----------------------------------	-----------	----------

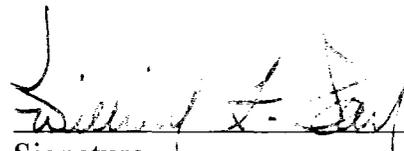
OTHER PARTY

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
David Boneau, Petroleum Engineer	30 Min.	Approximately 4
Greg Wilkes, Petroleum Engineer	30 Min.	Approximately 5

**PROCEDURAL MATTERS**

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

A Motion to Dismiss or in the Alternative a Motion to Continue Hearing has been filed on behalf of Yates Petroleum Corporation and Hanley Petroleum, Inc.

  
\_\_\_\_\_  
Signature

**CERTIFICATE OF SERVICE**

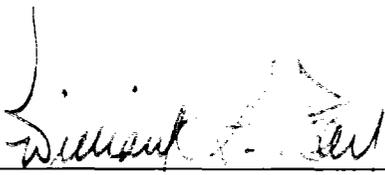
I hereby certify that I have caused a true and correct copy of the foregoing Pre-Hearing Statement to be mailed on this 17 day of August, 1997 to the following counsel of record:

James Bruce, Esq.  
612 Old Santa Fe Trail  
Suite B  
Santa Fe, New Mexico 87501

J. Scott Hall, Esq.  
Miller, Stratvert, Torgerson  
& Schlenker, P.A.  
Post Office Box 1986  
Santa Fe, New Mexico 87504-1986

Rand Carroll, Esq.  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505

W. Thomas Kellahin, Esq.  
Kellahin & Kellahin  
Post Office Box 2265  
Santa Fe, New Mexico 87504-2265

  
\_\_\_\_\_  
William F. Carr