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. 11897

APPLICATION OF DUGAN PRODUCTION CORP. FOR COMPULSORY POOLING AND DOWNHOLE COMMINGLING, RIO ARRIBA COUNTY, NEW MEXICO.

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
Dugan Production Corp.	W. Thomas Kellahin, Esq. Kellahin & Kellahin Post Office Box 2265 Santa Fe, New Mexico 87504-2265 (505) 982-4285
name, address, phone and contact person	
OPPOSITION OR OTHER PARTY	ATTORNEY

Caulkins Oil Company c/o P. L. Robinson 1600 Broadway, Suite 1400 Denver, CO 80202 (303) 861-4230

> name, address, phone and contact person

ATTORNEY

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

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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.)

OPPOSITION OR 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.)

Caulkins Oil Company will appear and present testimony in support of it being designated operator of the S/2 of Section 14, Township 26 North, Range 7 West to be dedicated to its Breech B 781 Well to be drilled to the Mesaverde and Dakota formations at a location 1800 feet from the South line and 1150 feet from the West line of said Section 14.

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PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES (Name and expertise)

EST. TIME

EXHIBITS

Robert L. Verquer,

Field Superintendent

15 Min.

Approximately 5

PROCEDURAL MATTERS

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

Signature

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CERTIFICATE OF MAILING

I hereby certify that on this ______ day of January, 1998 I have caused to be mailed a copy of our Pre-Hearing Statement in the above-captioned cases to the following counsel of record:

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

William F. Carr