

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

**APPLICATION OF PIONEER NATURAL
RESOURCES USA, INC. FOR
COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

NO. 11932

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Applicant as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

Pioneer Natural Resources USA, Inc.
Mr. Richard C. Winchester
303 West Wall Street, Ste 101
Post Office Box 3178
Midland, TX 79702-3178
915/571-1550

ATTORNEY

Conrad E. Coffield, Esq.
T. Calder Ezzell, Jr., Esq.
Hinkle, Cox, Eaton, Coffield
& Hensley, L.L.P.
218 Montezuma
Post Office Box 2068
505/982-4554

OPPONENT

ATTORNEY

STATEMENT OF THE CASE

Applicant seeks an order pooling all mineral interests from the surface to the base of the ABO formation underlying those certain lands described as the NE $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 18, Township 20 South, Range 39 East, N.M.P.M., Lea County, New Mexico. The project will increase recovery of reserves in the Pool.

PROPOSED EVIDENCE

APPLICANT

ESTIMATED TIME

EXHIBITS

Mr. Craig Clark
Independent Landman

10 minutes

Title Opinion and
correspondence
establishing a good faith
effort to obtain joinder
of all mineral and lease-
hold interests

Mr. David Keller
Geologist

10 minutes

Structure map and
cross section

OPPONENT

ESTIMATED TIME

EXHIBITS

PROCEDURAL MATTERS

None applicable at this time.

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD
& HENSLEY, L.L.P.

A handwritten signature in black ink, appearing to read "Conrad E. Coffield", is written over a horizontal line.

Conrad E. Coffield

T. Calder Ezzell, Jr.

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Attorney for Applicant

Pioneer Natural Resources USA, Inc.