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

98.III -7 PM 2:50

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

name, address, phone and

contact person

APPLICATION OF ENRON OIL & GAS COMPANY FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE 12005

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 William F. Carr, Esq.	
Enron Oil & Gas Company		
c/o Patrick Tower	Campbell, Carr, Berge & Sheridan, P.A.	
Post Office Box 2267	Post Office Box 2208	
Midland, TX 79702	Santa Fe, New Mexico 87504	
(915) 686-3758	(505) 988-4421	
name, address, phone and contact person		
OTHER PARTY	ATTORNEY	

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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.)

Enron Oil & Gas Company, applicant in the above-styled cause, seeks an order pooling all formations developed on 320-acre spacing underlying the W/2, including but not limited to the Grayburg-Morrow Gas Pool, in all formations developed on 160-acre spacing in the NW/4, in all formations developed on 80-acre spacing in the E/2 NW/4, and in all formations developed on 40-acre spacing from the surface to the base of the Chester formation in the SE/4 NW/4 of Section 2, Township 18 South, Range 29 East. Applicant proposes to dedicate this acreage to its STW "2" State Com Well No. 1 to be drilled at a standard location 1650 feet from the North and West lines (Unit F) of Section 2. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of applicant as operator of the well and a charge for the risk involved in drilling said well.

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.)

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PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Patrick J. Tower, Landman	10 Min.	Approximately 5
Barry Zinz, Geologist	10 Min.	Approximately 3

OTHER PARTY

WITNESSES	EST. TIME	EXHIBITS
(Name and expertise)		

PROCEDURAL MATTERS

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

Signature