

**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. 12027

APPLICATION OF BONNEVILLE  
FUELS CORP. FOR POOL CONTRACTION,  
POOL CREATION AND SPECIAL POOL RULES,  
SAN JUAN COUNTY, NEW MEXICO.

OIL CONSERVATION DIV.  
98 AUG 14 AM 10:56

**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**

Bonneville Fuels Corp.  
1660 Lincoln, Suite 1800  
Denver, CO 80264

(303) 863-1555

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

**OPPOSITION OR OTHER PARTY**

**ATTORNEY**

---

---

---

---

---

name, address, phone and  
contact person

---

---

---

---

---

**STATEMENT OF CASE**

**APPLICANT**

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

Bonneville Fuels Corp., applicant seeks the contraction of the Kutz-Gallup Pool by the deletion of portions of Sections 11 and 14, Township 27 North, Range 11 West, the creation of a new pool for production from the Gallup formation comprised of portions of Sections 11, 13, 14 and 15 of Township 27 North, Range 11 West and the promulgation of Special Pool Rules for this new pool including the adoption of 80-acre oil well spacing and special well location requirements.

**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.)

**PROPOSED EVIDENCE**

APPLICANT

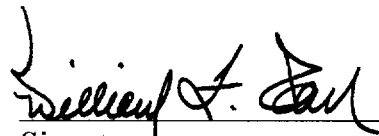
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Phil Wood, Land	10 Min.	Approximately 3
Bob Kozarek, Geology	20 Min.	Approximately 2
Alan Merrill, Petroleum Engineer	20 Min.	Approximately 2

OPPOSITION

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

**PROCEDURAL MATTERS**

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

  
\_\_\_\_\_  
Signature