

RC  
2/15

**JAMES BRUCE**

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February 15, 1999

Via Fax

Lori Wrotenbery  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505

Dear Ms. Wrotenbery:

Enclosed is a consolidated pre-hearing statement for Cases 12125  
and 12126.

Very truly yours,

  
James Bruce

MA  
2-16-99  
RC 2/15

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

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

APPLICATION OF GOTHIC PRODUCTION  
CORPORATION FOR AN UNORTHODOX  
INFILL GAS WELL LOCATION, CHAVES  
COUNTY, NEW MEXICO.

Case No. 12,125

APPLICATION OF GOTHIC PRODUCTION  
CORPORATION FOR AN UNORTHODOX  
INFILL GAS WELL LOCATION, CHAVES  
COUNTY, NEW MEXICO.

Case No. 12,126

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Gothic Production Corporation  
Suite 700  
5727 South Lewis Avenue  
Tulsa, Oklahoma 74105  
Attention: Angel Bruner  
(918) 749-5666

APPLICANT'S ATTORNEY

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

OTHER PARTY

OTHER PARTY'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks unorthodox gas well locations for the  
following wells:

(a) McClellan MOC Fed. Well No. 17, to be located 2475 feet  
FSL and 1495 feet FEL of §30-5S-25E; and

(b) Penjack Fed. Well No. 11, to be located 330 feet FNL and  
2310 feet FEL of §12-10S-25E.

The locations are based on geologic and topographic reasons. The wells will be drilled to test the Abo formation (Pecos Slope-Abo gas Pool). Each well is an infill well, as allowed by special pool rules.

OPPONENT**PROPOSED EVIDENCE**APPLICANT

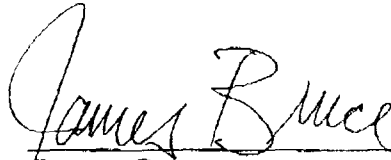
<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
James L. Schultz (landman)	10 min.	1. Land plat 2. Topographic map 3. Notice letters 4. Waiver letters
George Scott III (geologist)	10 min.	1. Isopach 2. Cross-section

OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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**PROCEDURAL MATTERS**

-None-

  
James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Gothic Production  
Corporation