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#### FAX COVER SHEET

DELIVER TO: Mark Ashley

COMPANY: Oil Conservation Division

CITY: Santa Fe, New Mexico

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MEMO: Mark: Enclosed is my pre-hearing statement in Cases 12142 and 12143.

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3-31-99

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

JAMESBRUCE

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

APPLICATION OF CROSS TIMBERS OIL COMPANY FOR COMPULSORY POOLING AND AN UNORTHODOX OIL WELL LOCATION, SAN JUAN COUNTY, NEW MEXICO.

APPLICATION OF CROSS TIMBERS OIL COMPANY FOR COMPULSORY POOLING AND AN UNORTHODOX OIL WELL LOCATION, SAN JUAN COUNTY, NEW MEXICO.

Case No. 12,142

Case No. 12,143

## PRE-HEARING STATEMENT

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

### APPEARANCES

#### APPLICANT

Cross Timbers Oil Company Suite 2000 810 Houston Street Houston, Texas 76102 Attention: George A. Cox (817) 870-8454

# APPLICANT'S ATTORNEY

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

# **OPPONENT**

# OPPONENT'S ATTORNEY

# STATEMENT OF THE CASE

## APPLICANT

Applicant seeks to pool all interests in the W% of Section 21 and the W% of Section 32, both in Township 28 North, Range 10 West, NMPM, from the base of the Pictured Cliffs formation to the base of the Dakota formation. The wells will be drilled to test the Dakota formation. There are several small interest owners who have not voluntarily committed their interests to the wells.

#### **OPPONENT**

## PROPOSED EVIDENCE

## APPLICANT

WITNESSES	EST. TIME	EXH1BITS
George A. Cox (landman)	15 mín.	<ol> <li>Land plat</li> <li>Interest listings</li> <li>Correspondence</li> <li>AFEs</li> <li>Notice letters</li> </ol>
(geologist)	10 min.	<ol> <li>Structure map</li> <li>Isopach</li> </ol>
(engineer)	10 min.	<ol> <li>Production data</li> <li>Pressure data</li> </ol>

#### **OPPONENT**

WITNESSES

EST. TIME

EXHIBITS

# PROCEDURAL MATTERS

The applications involve the same interest owners, and the geologic and engineering data is the same for both applications. Therefore, applicant requests that both cases be consolidated for hearing.

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

Attorney for Cross Timbers Oil Company