

**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. 12179

59 MAY 11 AM 8:02

OIL CONSERVATION DIV.

APPLICATION OF ENERQUEST RESOURCES, L.L.C.  
TO AMEND SPECIAL POOL RULES FOR THE  
EAST HOBBS-SAN ANDRES POOL,  
LEA COUNTY, NEW MEXICO.

**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**

Enerquest Resource, L.L.C.  
c/o Chris Renaud  
Post Office Box 11150  
Midland, TX 79702  
(915) 685-3116  
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**

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\_\_\_\_\_  
\_\_\_\_\_

name, address, phone and  
contact person

**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.)

Enerquest Resources, L.L.C., applicant in the above-captioned case seeks to amend the special rules for the East Hobbs-San Andres Pool, as promulgated by Division Order No. R-7511, to include the assignment at a special depth bracket allowable, pursuant to Division Rule 505.D, of 160 barrels of oil per day. The East Hobbs-San Andres Pool comprises portions of Section 25 of Township 18 South, Range 38 East, and Sections 29, 30, 31 and 32, of Township 18 South, Range 39 East.

**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

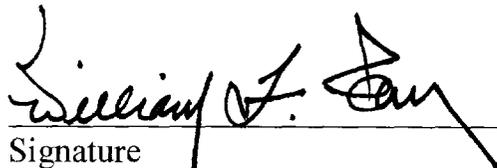
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Robert W. Floyd, Landman	10 Min.	Approximately 3
David A. Godsey, Geologist	15 Min.	Approximately 3
Christopher P. Renaud, Petroleum Engineer	15 Min.	Approximately 3

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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**PROCEDURAL MATTERS**

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

  
Signature