

**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. 12247

OIL CONSERVATION DIV.  
99 SEP 14 PM 12:10

APPLICATION OF AMERISTATE OIL & GAS, INC.  
FOR COMPULSORY POOLING, EDDY 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**

Ameristate Oil & Gas, Inc.  
Attn: Mark Nearburg  
211 Ranch Road 620 South, Suite 120  
Austin, Texas 78734  
(512) 266-6007

**ATTORNEY**

William F. Carr, Esq.  
Paul R. Owen, Esq.  
Campbell, Carr, Berge & Sheridan, P.A.  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421

**OPPOSITION OR OTHER PARTY**

**ATTORNEY**

None Known

**STATEMENT OF CASE**

**APPLICANT**

Ameristate Oil & Gas, Inc., applicant in the above-captioned case, seeks an order pooling all minerals from the surface to the base of the Morrow formation in Section 30, Township 17 South, Range 25 East, Eddy County, New Mexico, as follows:

- a. underlying the N/2, forming a standard 320-acre oil spacing and proration unit for formations and/or pools developed on 320-acre spacing within that vertical extent,

which presently includes, but is not necessarily limited to, the Richard Knob Atoka-Morrow Gas Pool;

b. pooling all minerals from the surface to the base of the Morrow formation underlying the NE/4 of Section 30, forming a standard 160-acre oil spacing and proration unit for formations and/or pools developed on 160-acre spacing within that vertical extent, which presently includes, but is not necessarily limited to, the Eagle Creek-Strawn Gas Pool;

c. pooling all minerals from the surface to the base of the Morrow formation underlying the S/2 NE/4 of Section 30, forming a standard 80-acre oil spacing and proration unit for all formations and/or pools developed on 80-acre spacing within that vertical extent; and,

d. the SW/4 NE/4 to form a standard 40-acre gas spacing and proration unit for formations and/or pools developed on 40-acre spacing within that vertical extent which presently includes, but is not necessarily limited to, the Undesignated Eagle Creek-San Andres Pool.

e. this pooled unit to be dedicated to Ameristate's proposed Maneater Federal Com Well No. 1, to be drilled at a standard location \_\_\_\_\_ feet from the South line and \_\_\_\_\_ feet from the West line of said Section 30.

#### OPPOSITION OR OTHER PARTY

None Known

## **PROPOSED EVIDENCE**

### **APPLICANT**

<u>Witness</u>	<u>Est. Time</u>	<u>Exhibits</u>
Mark Nearburg, Landman	20 Min.	Approximately 4
Louis Mazzullo, RG, Geologist	20 Min.	Approximately 4

### **OPPOSITION**

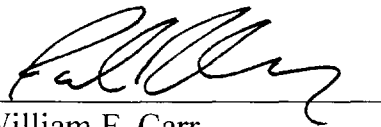
<u>Witness</u>	<u>Est. Time</u>	<u>Exhibits</u>
	<u>None Known</u>	

## **PROCEDURAL MATTERS**

None Known

Respectfully submitted,

CAMPBELL, CARR, BERGE &  
SHERIDAN, P. A.



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ATTORNEYS FOR APPLICANT  
AMERISTATE OIL & GAS INC.