

MM
4-17-00

**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. 12385

**APPLICATION OF TEXACO EXPLORATION AND PRODUCTION, INC.
FOR COMPULSORY POOLING
CHAVES COUNTY, NEW MEXICO.**

OIL CONSERVATION DIV.
00 APR 14 PM 12:53

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

Texaco Exploration and Production, Inc.
Attn: Mike Mullins
P.O. Box 3109
Midland, TX 79702
(915) 688-4488
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

STATEMENT OF CASE

APPLICANT

Application of Texaco Exploration and Production Inc. for compulsory pooling, Chaves County, New Mexico. Applicant in the above-styled cause seeks an order pooling all mineral interests in all formations from the surface to the base of the Morrow formation in the W/2 of Section 36, Township 15 South, Range 31 East, N.M.P.M., Chaves County, New Mexico, in the following manner: the W/2 for all formations and/or pools developed on 320-acre spacing; the NW/4 for all formations/pools developed on 160-acre spacing; the S/2 NW/4 for all formations/pools developed on 80-acre spacing; and, the SE/4 NW/4 for all formations/pools developed on 40-acre spacing. Said units are to be dedicated to the Dulce "36" State Com No. 1 Well, to be drilled as a wildcat well at a standard location in the NW/4 of said Section 36.

Also to be considered will be the cost of drilling and completing said well; the allocation of the cost thereof and of actual operating costs and charges for supervision; designation of applicant as operator of the well; and, a charge for risk involved in drilling said well. Said area is located approximately 7 miles North of Maljamar, New Mexico.

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

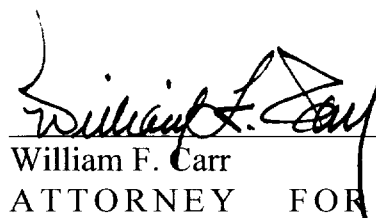
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Mike Mullins (Landman)	Approx. 15 min.	Approx. 7
Mike Cervantes (Petroleum Geologist)	Approx. 10 min.	Approx. 3

OPPOSITION

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

PROCEDURAL MATTERS

Texaco Exploration and Production, Inc. has none at this time.



William F. Carr
ATTORNEY FOR TEXACO
EXPLORATION AND PRODUCTION,
INC.

