

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

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

APPLICATION OF SOUTHWESTERN ENERGY  
PRODUCTION COMPANY FOR COMPULSORY  
POOLING AND TWO NON-STANDARD GAS  
SPACING AND PRORATION UNITS, EDDY  
COUNTY, NEW MEXICO.

Case No. 12500

PRE-HEARING STATEMENT

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

APPEARANCE OF PARTIES

Applicant

Southwestern Energy  
Production Company  
Suite 300  
2350 North Sam Houston Parkway East  
Houston, Texas 77032

Attention: Samuel Glenn Thompson  
(282) 618-4719

Attorney

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Opposition or Other Party

Yates Petroleum Corporation  
Sacramento Partners Limited Partnership  
Marbob Energy Corporation

Attorney

William F. Carr

STATEMENT OF CASE

Applicant seeks an order pooling all mineral interests from the base of the San Andres formation to the base of the Morrow formation underlying the following described acreage in Section 31, Township 17 South, Range 28 East, NMPM, and in the following manner: Lots 1, 2, E $\frac{1}{2}$ NW $\frac{1}{4}$ , and NE $\frac{1}{4}$  (the N $\frac{1}{4}$  equivalent) to form a non-standard 327.09-acre gas spacing and proration unit for any and all formations and/or pools developed on 320-acre spacing within that vertical extent, including but not limited to the Undesignated Southeast Logan Draw-Atoka Gas Pool and Undesignated North Illinois Camp-Morrow Gas Pool; Lots 1, 2, and E $\frac{1}{2}$ NW $\frac{1}{4}$  (the NW $\frac{1}{4}$  equivalent) to form a non-standard 167.09-acre gas spacing and proration unit for any and all formations and/or pools developed on 160-acre spacing

within that vertical extent, including the Undesignated Logan Draw-Wolfcamp Gas Pool; and the SE $\frac{1}{4}$ NW $\frac{1}{4}$  to form a standard 40-acre oil spacing and proration unit for any and all formations and/or pools developed on 40-acre spacing within that vertical extent, including but not limited to the Undesignated Logan Draw-Wolfcamp Pool. The units are to be dedicated to applicant's Big Bluff "31" State Com. Well No. 1, to be drilled at an orthodox location in the SE $\frac{1}{4}$ NW $\frac{1}{4}$  of Section 31.

#### PROPOSED EVIDENCE

##### Applicant

<u>Witnesses</u>	<u>Est. Time</u>	<u>Exhibits</u>
Samuel Glenn Thompson (landman)	10 min.	(1) Land plat (2) Correspondence (3) AFE
Jim Denny (geologist)	10 min.	(1) Structure map (2) Isopach

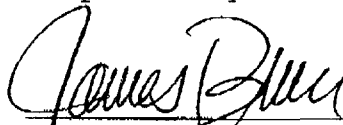
##### Opposition or Other Party

<u>Witnesses</u>	<u>Est. Time</u>	<u>Exhibits</u>
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#### PROCEDURAL MATTERS

-None-

Respectfully submitted,



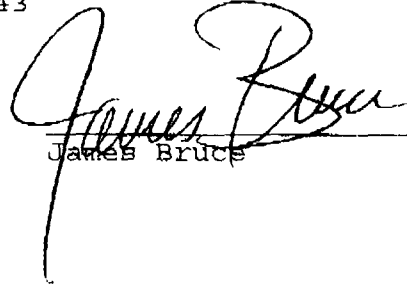
James Bruce  
Post Office Box 1056  
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Attorney for Southwestern Energy  
Production Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was sent via facsimile transmission to the following counsel of record this 20th day of February, 2001:

William F. Carr  
Holland & Hart and Campbell & Carr  
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James Bruce