

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

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

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

*M.S.*  
Case No. 12511  
Case No. 12523  
Case No. 12524  
Case No. 12525

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) 877-2454

APPLICANT'S ATTORNEY

James Bruce  
Post Office 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 E½ S28-28N-10W, E½ S17-28N-10W, E½ S4-27N-10W, and E½ S16-27N-10W, 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**

**EXHIBITS**

George A. Cox  
(landman)

15 min.

1. Land plat
2. Interest listings
3. Correspondence
4. AFES
5. Notice letters

(geologist)

10 min.

1. Structure map
2. Isopach

Barry Voigt  
(engineer)

10 min.

1. Production data
2. Pressure data

**OPPONENT**

**WITNESSES**

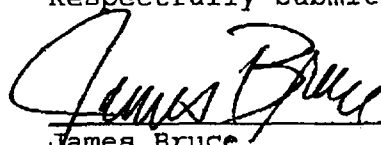
**EST. TIME**

**EXHIBITS**

**PROCEDURAL MATTERS**

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

Respectfully submitted,



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

Attorney for Cross Timbers Oil Company