

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

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
George A. Cox (landman)	15 min.	1. Land plat 2. Interest listings 3. Correspondence 4. AFEs 5. Notice letters
<u> </u> (geologist)	10 min.	1. Structure map 2. Isopach
Barry Voigt (engineer)	10 min.	1. Production data 2. Pressure data


OPPONENT

WITNESSES	EST. TIME	EXHIBITS
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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