

*Ashtley*  
*Campbell, Carr, Berge & Sheridan, P.A.*  
*12/12/13*

**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:**

**APPLICATION OF MAYNARD OIL COMPANY  
FOR SIMULTANEOUS DEDICATION IN THE  
WILSON-MORROW GAS POOL  
LEA COUNTY, NEW MEXICO.**

**CASE NO. 12539**

OIL CONSERVATION DIV.  
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**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**

Maynard Oil Company  
Attn: Cassandra Foster  
8080 North Central Expressway, Suite 660  
Dallas, Texas 75206  
214 891-8461

**ATTORNEY**

Michael H. Feldewert  
Campbell, Carr, Berge & Sheridan, P.A.  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421

**OTHER APPEARANCES**

James G. Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043  
Attorney for Nearburg Exploration Company, L.L.C.

**STATEMENT OF CASE**

APPLICANT

Applicant seeks authorization to simultaneously dedicate its existing Wilson Deep Unit Well No. 1 (located 2080 feet from the North and West lines - Unit F) and its proposed Wilson Unit Well No. 2 (to be located at a standard location 660 feet from the North and West lines - Unit D) to a standard 320-acre gas spacing unit comprised of the W/2 of Section 13, T-21-S, R-34-E, NMPM. This location is approximately 16 miles west-northwest of Eunice, New Mexico.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Cassandra Foster Land	Approx. 10 minutes	Approx. 2
Ronnie Buck Geology	Appox. 15 minutes	Approx. 7

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
None		

**PROCEDURAL MATTERS**

Maynard Oil Company has none at this time.



Certificate of Service

The undersigned hereby certifies that the foregoing pre-hearing statement was mailed and faxed to James Bruce, P. O. Box 1056, Santa Fe, NM 87504, Fax No. 982-2151 on November 13, 2000.

  
Michael H. Feldewert