

**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:**

**THE APPLICATION OF  
THRESHOLD DEVELOPMENT COMPANY  
FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

**CASE NO. 12583**

OIL CONSERVATION DIV.  
01 MAR 16 PM 4:20

**PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Holland & Hart LLP and Campbell & Carr,  
as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Threshold Development Company  
777 Taylor Street, PII-D  
Fort Worth, TX 76102  
Attn: Gary Tidmore  
(817) 870-1483

**ATTORNEY**

William F. Carr, Esq.  
Holland & Hart LLP and  
Campbell & Carr  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421

**OPPOSITION OR OTHER PARTY**

Energen Resources Corporation  
605 Richard Arrington Jr. Blvd. North  
Birmingham, Alabama 35203-2707  
(205) 326-8129

**ATTORNEY**

J. Scott Hall, Esq.  
Miller, Stratvert & Torgerson, P.A.  
Post Office Box 1986  
Santa Fe, NM 87504  
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## STATEMENT OF CASE

### APPLICANT

Applicant seeks an order pooling all mineral interests in all formations developed on 320-acre spacing from the surface to the base of the Wolfcamp formation in the W/2 of Section 16, Township 24 South, Range 33 East, in the following manner: the W/2 for all formations/pools developed on 320-acre spacing which includes but is not necessarily limited to the Undesignated Johnson Ranch-Wolfcamp Gas Pool, the NW/4 for all formations/pools developed on 160-acre spacing, and the NE/4 NW/4 for all formations/pools developed on 40-acre spacing. Said units are to be dedicated to the Johnson Ranch State 16 Well No. 1 to be drilled at a standard location in the NE/4 NW/4 of Section 16. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as 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 20 miles West of Jal, New Mexico.

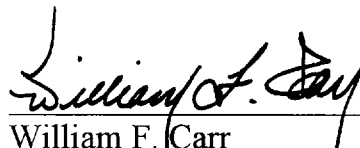
## PROPOSED EVIDENCE

### APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Gary Tidmore (Landman)	Approx. 15 min.	Approx. 6
David White (Geologist)	Approx. 10 min.	Approx. 3

## PROCEDURAL MATTERS

Threshold Development Company has none at this time.

  
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William F. Carr  
ATTORNEY FOR THRESHOLD  
DEVELOPMENT COMPANY