

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

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

CASE NO. 12583

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Miller, Stratvert & Torgerson, P.A. on behalf
of Energen Resources Corporation, as required by the Oil Conservation Division.

APPEARANCES

APPLICANT'S ATTORNEY

Mr. William F. Carr, Esq.
Campbell, Carr, Berge & Sheridan
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

APPLICANT

Threshold Development Company

OPPONENT'S ATTORNEY

J. Scott Hall, Esq.
Miller, Stratvert & Torgerson, P.A.
Post Office Box 1986
Santa Fe, New Mexico 87504
(505) 989-9614

OPPONENT

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

OTHER PARTY'S ATTORNEY

None to date/unknown

OTHER PARTY

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OIL CONSERVATION DIV.

STATEMENT OF THE CASE

APPLICANT

Applicant seeks to pool the W/2 of Section 16, T-24-S, R-33-E, NMPM, Lea County, New Mexico for dedication to its Johnson Ranch State 16 Well No. 1 to be drilled at a standard location in the NE/NW of Section 16.

PROPOSED EVIDENCE

WITNESSES:	Est. Time	No. of Exhibits
Ken Gray (Landman)	15	3
Ken Smith (Petroleum Engineer)	20	3
Dave Cromwell (Geologist)	15	4

PROCEDURAL MATTERS

None.

MILLER, STRATVERT & TORGERSON, P.A.

By

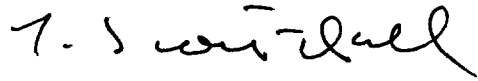


J. Scott Hall
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Certificate of Mailing

I hereby certify that a true and correct copy of the foregoing was mailed to counsel of record on the 7 day of March, 2001, as follows:

Mr. William F. Carr, Esq.
Campbell, Carr, Berge & Sheridan
Post Office Box 2208
Santa Fe, New Mexico 87504

A handwritten signature in black ink, appearing to read "J. Scott Hall", written in a cursive style.

J. Scott Hall