

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. 12585

**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**

OIL CONSERVATION DIV.  
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## STATEMENT OF THE CASE

### APPLICANT

Applicant seeks to pool the N/2 of Section 28, T-24-S, R-33-E, NMPM, Lea County, New Mexico for dedication to its Johnson Ranch 28 State Com. Well No. 1 to be drilled at a standard location in the NE/4 NW/4 of Section 4.

### 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  
Attorneys for Energen Resources Corp.  
Post Office Box 1986  
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(505) 989-9614

**Certificate of Mailing**

I hereby certify that a true and correct copy of the foregoing was forwarded to counsel of record on the 21 day of March, 2001, as follows:

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

*J. Scott Hall*

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J. Scott Hall