

**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:**

**CASE NO. 12637**

**APPLICATION OF TEXACO EXPLORATION AND  
PRODUCTION, INC. FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

01 MAR 33 PM 3:16  
OIL CONSERVATION DIV.

**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**

Texaco Exploration and Production, Inc.  
Attention: Mike Mullins  
Post Office Box 3109  
Midland, Texas 79702  
(915) 688.4488

**ATTORNEY**

William F. Carr, Esq.  
Holland & Hart LLP and Campbell & Carr  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988.4421

## STATEMENT OF CASE

### APPLICANT

Applicant in the above-styled cause seeks an order pooling all mineral interests from the surface to the base of the Wolfcamp formation, Remuda-Wolfcamp Pool, underlying the following described acreage in Section 24 Township 23 South, Range 29 East, in the following manner: (a) the S/2 to form a standard 320-acre spacing and proration unit for any and all formations and/or pools developed on 320-acre spacing, (b) the SW/4 to form a standard 160-acre gas spacing and proration unit for any and all formations and/or pools developed on 160-acre spacing, and the SE/4 SW/4 to form a standard 40-acre spacing and proration unit for any and all formations and/or pools developed on 40-acre spacing. These units are to be dedicated to a single well, the proposed Remuda Basin "24" State Well No. 1 to be drilled as a wildcat well at a standard location 750 feet from the South line and 1900 feet from the West line of Section 24. 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. The proposed well location is approximately 8 miles east of Loving, New Mexico.

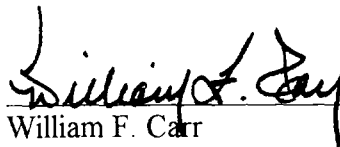
## PROPOSED EVIDENCE

### APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Mike Mullins (Land)	10 Minutes	Approximately 6
Kim Moore (Geology)	10 Minutes	Approximately 2

**PROCEDURAL MATTERS**

Texaco Exploration and Production, Inc. has none at this time.

A handwritten signature in black ink, appearing to read "William F. Carr", is written over a horizontal line.

William F. Carr  
ATTORNEY FOR TEXACO EXPLORATION  
AND PRODUCTION, INC.