

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

IN THE MATTER OF THE HEARINGS CALLED  
BY THE OIL CONSERVATION DIVISION FOR  
THE PURPOSE OF CONSIDERING:

APPLICATION OF NADEL AND GUSSMAN PERMIAN,  
L.L.C., FOR COMPULSORY POOLING, EDDY  
COUNTY, NEW MEXICO.

Case No. 12706

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

**APPEARANCES**

APPLICANT

Nadel and Gussman Permian, L.L.C.  
Suite 508  
601 North Marienfeld  
Midland, Texas 79701  
Attention: Sam H. Jolliffe IV  
(915) 682-4429

APPLICANT'S ATTORNEY

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

OTHER PARTY

Joe Helm  
P.O. Box 1081  
Artesia, New Mexico 88211

OTHER PARTY'S ATTORNEY

**STATEMENT OF THE CASE**

APPLICANT

Applicant seeks an order pooling all mineral interests from the surface to the upper 200 feet of the Mississippian formation underlying the following described acreage in Section 17, Township 19 South, Range 24 East, NMPM, and in the following manner: The S½ to form a standard 320-acre gas spacing and proration unit for any and all formations and/or pools developed on 320-acre spacing within that vertical extent, including but not limited to the Undesignated Hoag Tank-Wolfcamp Gas Pool, Undesignated Antelope Sink-Upper Pennsylvanian Gas Pool, Undesignated Hoag Tank-Strawn Gas Pool, and Hoag Tank-Morrow Gas Pool; and the SE¼ to form a standard 160-acre gas spacing and proration unit for any and all formations and/or pools developed on 160-acre spacing within that

vertical extent. The units are to be dedicated to applicant's Ancell Well No. 1, to be drilled at an orthodox location in the SE¼ of Section 17. Also to be considered will be the cost of drilling and completing the 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 the risk involved in drilling and completing the well. The units are located approximately 11¼ miles northwest of Seven Rivers, New Mexico.

#### OTHER PARTY

Mr. Helm is an unleased mineral interest owner. Applicant is unsure of Mr. Helm's position.

#### **PROPOSED EVIDENCE**

##### APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Sam H. Jolliffe IV (landman)	15 Min.	(a) Land plat (b) Correspondence (c) AFE (d) Notice affidavits
William McCaw (landman)	10 min.	
Scott Germann (geologist)	15 min.	(a) Structure map (b) Isopach (c) Cross sections

##### OTHER PARTY

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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#### **PROCEDURAL MATTERS**

Respectfully submitted,



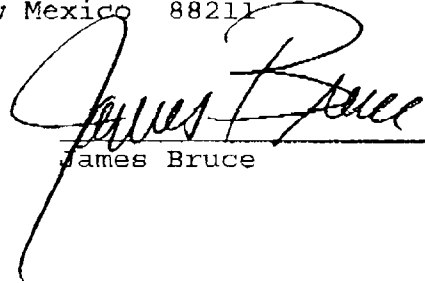
James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Applicant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was mailed to the following party of record this 17th day of August, 2001:

Joe Helm  
P.O. Box 1081  
Artesia, New Mexico 88211

  
James Bruce