

**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. 12834

**APPLICATION OF TRILOGY OPERATING, INC
FOR COMPULSORY POOLING
LEA COUNTY, NEW MEXICO.**

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by TRILOGY OPERATING, INC. as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

Trilogy Operating, Inc.
P. O. Box 7606
Midland, Texas 79708
(915) 686-2027
attn: Jerry W. Weant

ATTORNEY

W. Thomas Kellahin
KELLAHIN AND KELLAHIN
P.O. Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285

STATEMENT OF TRILOGY OPERATING, INC.

Trilogy has a working interest ownership in the oil and gas minerals underlying the NE/4SW/4 of Section 24, T19N, R38W, NMPM, Lea County, New Mexico.

Trilogy, to those working interest owners for whom Trilogy could obtained address, has proposed that this well be drilled and completed for potential production from formations from the surface to the based of the Abo formation in this 40-acre spacing unit.

Despite its good faith efforts, Trilogy has been unable to obtain a written voluntary agreement from all of the working interest and or mineral interest owners. Therefore, in accordance with Rule 1207.A(1)(b), Trilogy needs an order of the Division pooling the identified and described mineral interests in order to protect correlative rights and prevent waste.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES

EST. TIME EXHIBITS

By Affidavit pursuant to Rule 1207.A(1)(b)

PROCEDURAL MATTERS

None anticipated at this time.

KELLAHIN AND KELLAHIN

By: 

W. Thomas Kellahin

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