

**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. 12891

**APPLICATION OF SEELY OIL COMPANY FOR
CONTRACTION OF THE UNITIZED FORMATION IN
THE E-K QUEEN UNIT, LEA COUNTY, NEW MEXICO.**

PRE-HEARING STATEMENT

OIL CONSERVATION DIV.
09 JUL - 2 PM 3:06

Holland & Hart LLP submits this Pre-Hearing Statement as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Seely Oil Company
Attention: Clarence W. Stumhoffer
Post Office Box 100416
Fort Worth, Texas 76185
(817) 946-8795

ATTORNEY

William F. Carr, Esq.
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421

STATEMENT OF CASE

APPLICANT

Applicant seeks an order approving the contraction of the unitized formation in the E-K Queen Unit located in portions of Section 13, 14, 23 and 24 of Township 18 South, Range 33 East, and Sections 18 and 19 of Township 18 South, Range 34 East, to exclude the lowermost 100 feet of the unitized formation thereby excluding from the unit the Penrose Sand Member of the Queen formation, E-K Queen-Yates-Seven Rivers-Queen Pool. The unit is located approximately 14 miles southwest of Lovington, New Mexico.

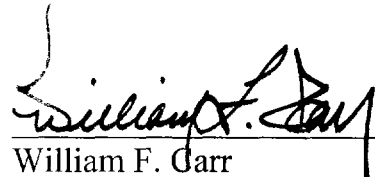
PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and Expertise)	ESTIMATED TIME	EXHIBITS
Clarence Stumhoffer (Petroleum Engineer)	Approx. 20 Minutes	7

PROCEDURAL MATTERS

Seely Oil Company has none at this time.



William F. Garr
Attorney for Seely Oil Company

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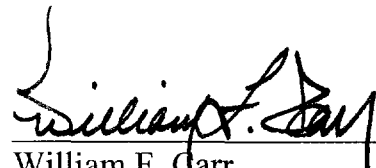
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