# 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. 12924

APPLICATION OF EOG RESOURCES, INC. FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

## PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

#### APPEARANCES OF PARTIES

#### **APPLICANT**

#### **ATTORNEY**

EOG Resources, Inc. Attn: Patrick Tower P.O. Box 2267 Midland, Texas 79702 (915) 686-3776 William F. Carr, Esq. Holland & Hart LLP Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988.4421

#### STATEMENT OF CASE

#### **APPLICANT**

Applicant in the above-styled cause seeks an pooling all mineral interests from the surface through the top 100 feet of the Mississippian Chester formation in the following described acreage: the Lots 3 and 4, E/2 SW/4, and SE/4 (S/2 equivalent) to form a spacing and proration unit for all formations developed on 321.94-acre spacing within that vertical

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extent which includes but is not necessarily limited to the Undesignated North Hume-Morrow Gas Pool and the Undesignated North Eidson-Morrow Gas Pool; SW/4 to form a standard spacing and proration unit for all formations developed on 160-acre spacing within that vertical extent; the S/2 SW/4 to form a standard spacing and proration unit for all formations and pools developed on 80-acre spacing within that vertical extent which includes but is not necessarily limited to the Big Dog-Atoka Pool; and the NW/4 SW/4 to form a standard spacing and proration unit for all formations developed on 40-acre spacing within that vertical extent which includes but is not necessarily limited to the Undesignated Big Dog-Strawn Pool and the Undesignated Townsend Permo Upper Pennsylvanian Pool, all in Section 30, Township 15 South, Range 35 East, N.M.P.M., Lea County, New Mexico. Applicant proposes to dedicate the pooled units to its John's Hopper "30" Federal Well No. 3 to be drilled at a standard gas well location 1980 feet from the South line and 880 feet from the West line of said Section 30. 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. Said area is located approximately 5 miles northwest of Lovington, New Mexico.

#### PROPOSED EVIDENCE

### <u>APPLICANT</u>

WITNESSES (Name and Expertise)	ESTIMATED TIME	EXHIBITS
Patrick Tower (Land)	Approx. 15 Minutes	Approx. 6
David Godsey (Geology)	Approx. 10 Minutes	Approx. 2

#### PROCEDURAL MATTERS

EOG Resources, Inc., has none at this time.

Attorney for EOG Resources, Inc.

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