

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:

APPLICATION OF OCEAN ENERGY,
INC. FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.

No. 12960

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Ocean Energy, Inc.
as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Ocean Energy, Inc.
Suite 1600
1001 Fannin
Houston, Texas 77002
Attention: Derold Maney
(713) 265-6897

APPLICANT'S ATTORNEY

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

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order pooling all mineral interests from the surface to 200 feet below the top of the Mississippian formation, except the Wolfcamp formation, underlying the W $\frac{1}{2}$ of Section 23, Township 14 South, Range 37 East, NMPM. The well units are to be dedicated to applicant's Brickyard "23" Well No. 1, drilled at a location 660 feet from the south line and 1980 feet from the west line of Section 23. 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.

OPPONENT

PROPOSED EVIDENCE**APPLICANT****WITNESSES**

Derold Maney
(landman)

EST. TIME

10 min.

EXHIBITS

four

(geologist)

10 min.

three

OPPONENT**WITNESSES****EST. TIME****EXHIBITS****PROCEDURAL MATTERS**

-None-

Respectfully submitted,



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Attorney for Ocean Energy, Inc.