

MONTGOMERY & ANDREWS, P.A.

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March 11, 2003

TELECOPY COVER SHEET

TO: Oil Conservation Division
Mr. Thomas Kellabin
Mr. J. Scott Hall

TELEFAX NO: (505) 476-3462**TELEFAX NO: (505) 982-2047****TELEFAX NO: (505) 989-9857**

FROM: Paul R. Owen, Esq.

TELEPHONE NO: (505) 986-2538**TOTAL PAGES TO FOLLOW:**3

Message: Application of the New Mexico Oil Conservation Division through the Environmental Bureau Chief, for an Order Determining the Responsible Party or Parties and Ordering the Responsible Party or Parties to Conduct Division-Approved Corrective Action with Respect to Hydrocarbon Release, Lea County, New Mexico, OCD Case No. 13004

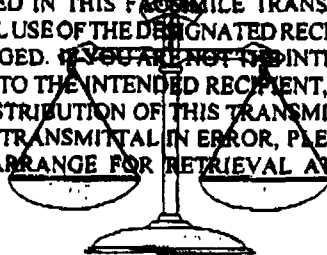
ATTACHED PLEASE FIND THE ATTACHED AMENDED PREHEARING STATEMENT, WHICH I WOULD LIKE YOU TO FAX FILE TODAY. PLEASE CALL IF YOU HAVE ANY QUESTIONS. THANK YOU.

This fax is being sent from (505) 982-4289

CLIENT NAME: Samedan

CLIENT NO.: 12674-03-01

THE INFORMATION CONTAINED IN THIS FACSIMILE TRANSMITTAL IS INTENDED FOR THE PERSONAL AND CONFIDENTIAL USE OF THE DESIGNATED RECIPIENT. THIS TRANSMITTAL MAY BE CONFIDENTIAL OR PRIVILEGED. IF YOU ARE NOT THE INTENDED RECIPIENT OR AN AGENT RESPONSIBLE FOR DELIVERY TO THE INTENDED RECIPIENT, BE AWARE THAT ANY REVIEW, DISCLOSURE, COPYING OR DISTRIBUTION OF THIS TRANSMITTAL IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMITTAL IN ERROR, PLEASE NOTIFY US BY TELEPHONE IMMEDIATELY SO WE CAN ARRANGE FOR RETRIEVAL AT NO COST TO YOU (COLLECT 505/982-3873). THANK YOU.



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

**APPLICATION OF THE NEW MEXICO
OIL CONSERVATION DIVISION,
THROUGH THE ENVIRONMENTAL
BUREAU CHIEF, FOR AN ORDER
DETERMINING THE RESPONSIBLE
PARTY OR PARTIES AND ORDERING
THE RESPONSIBLE PARTY OR PARTIES
TO CONDUCT DIVISION-APPROVED
CORRECTIVE ACTION WITH RESPECT
TO A HYDROCARBON RELEASE; LEA
COUNTY, NEW MEXICO.**

CASE NO. 13004

AMENDED PREHEARING STATEMENT

This Prehearing Statement is submitted by Samedan Oil Corporation, by and through counsel, Montgomery & Andrews, P.A. as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

New Mexico Oil Conservation Division

ATTORNEY

David Brooks, Esq.
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

OPPOSITION OR OTHER PARTY

Samedan Oil Corporation
c/o Arnold J. Johnson, Esq.
Noble Energy
350 Glenborough Drive, Suite 100
Houston, Texas 77067-3299

ATTORNEY

Paul R. Owen, Esq.
Montgomery & Andrews, P.A.
Post Office Box 2307
Santa Fe, New Mexico 87504-2307
(505) 982-3873

Occidental Permian Ltd.

W. Thomas Kellahin, Esq.
Post Office Box 2265
Santa Fe, New Mexico 87504-2265

Shell Exploration & Production Company

J. Scott Hall, Esq.
Miller, Stratvert P.A.
Post Office Box 1986
Santa Fe, New Mexico 87504-2265

STATEMENT OF CASE

APPLICANT

The Oil Conservation Division seeks an Order determining the responsible party or parties and ordering the responsible party or parties to conduct Division-approved corrective action with respect to a hydrocarbon release, based on a complaint made by a surface owner, Gary Johnson, in Lea County, New Mexico.

PROPOSED EVIDENCE

SAMEDAN OIL CORPORATION

WITNESSES

EST. TIME

EXHIBITS

Deb Lambertson

Approx. 30 min.

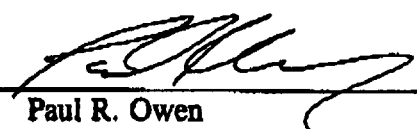
Approx. 4

PROCEDURAL MATTERS

The Environmental Bureau of the Oil Conservation Division and Samedan Oil Corporation had reached a tentative agreement to continue the case if Samedan would develop and pursue a workplan. Based on that tentative agreement, Samedan sought continuance of this matter to the May 8, 2003 docket to allow the parties time to implement that agreement. Although that Motion was denied, Samedan will be submitting a request for reconsideration on the afternoon of March 11, 2003.

Occidental Permian, Ltd. has submitted a Motion to Dismiss. The Division has denied that Motion.

MONTGOMERY & ANDREWS, P.A.

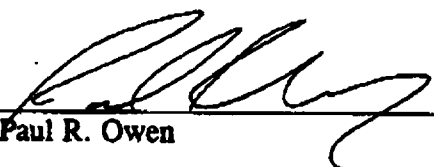
By 
 Paul R. Owen
 Post Office Box 2307
 Santa Fe, New Mexico 87504-2307
 (505) 982-3873
 ATTORNEY FOR SAMEDAN OIL
 CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of March, 2003, I have caused a copy of Samedan's Prehearing Statement in the above-captioned case to be served via facsimile upon the following:

W. Thomas Kellahin, Esq.
 Kellahin & Kellahin
 Post Office Box 2265
 Santa Fe, New Mexico 87504-2265

J. Scott Hall, Esq.
 Miller, Stratvert & Torgerson PA
 Post Office Box 1986
 Santa Fe, New Mexico 87504-1986


 Paul R. Owen

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TELECOPY COVER SHEET

TO: Oil Conservation Division
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Mr. J. Scott Hall

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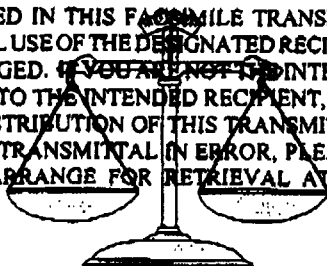
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This fax is being sent from (505) 982-4289

CLIENT NAME: Trilogy

CLIENT NO.: 12658-02-01

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TO A HYDROCARBON RELEASE; LEA
COUNTY, NEW MEXICO.**

CASE NO. 13004

PREHEARING STATEMENT

This Prehearing Statement is submitted by Trilogy Operating, Inc., by and through counsel, Montgomery & Andrews, P.A. as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

New Mexico Oil Conservation Division

ATTORNEY

David Brooks, Esq.
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

OPPOSITION OR OTHER PARTY

Samedan Oil Corporation
c/o Arnold J. Johnson, Esq.
Noble Energy
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Houston, Texas 77067-3299

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By


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ATTORNEY FOR SAMEDAN OIL
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