

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

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
COMMISSION FOR THE PURPOSE OF
CONSIDERING:

CASE NOS. 10345
RECEIVED and 10346
(De Novo)
JAN 10 1997

APPLICATION OF BHP PETROLEUM
(AMERICAS) INC. FOR
COMPULSORY POOLING,
SAN JUAN COUNTY, NEW MEXICO.

OIL CONSERVATION DIVISION

PRE-HEARING STATEMENT

This Prehearing Statement is submitted by William F. Carr, as required by the Oil Conservation Commission.

APPEARANCES OF PARTIES

APPLICANT

BHP Petroleum (Americas) Inc. _____

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name, address, phone and
contact person

ATTORNEY

James G. Bruce _____
Hinkle, Cox, Eaton, Coffield & Hensley
500 Marquette, NW, #800 _____
Albuquerque, New Mexico 87102 _____
(505) 768-1500 _____

OPPOSITION OR OTHER PARTY

Louise Y. Locke _____
d/b/a Locke-Taylor Drilling Co. _____
139-1/2 East 2nd Street _____
Rifle, CO 81650 _____

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name, address, phone and
contact person

ATTORNEY

William F. Carr _____
Campbell, Carr, Berge & Sheridan, P.A.
Post Office Box 2208 _____
Santa Fe, New Mexico 87504 _____
(505) 988-4421 _____

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STATEMENT OF CASE

APPLICANT

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

Louise Y. Locke, d/b/a Locke-Taylor Drilling Company opposes the compulsory pooling applications of BHP Petroleum (Americas) Inc. which affect her interest in the S/2 of Section 23, Township 29 North, Range 13 West, N.M.P.M., San Juan County, New Mexico. BHP failed to seek or obtain voluntary agreement with Mrs. Locke for the development of the W/2 of Section 23 and drilled its Gallegos Canyon Unit Well No. 390 at its own risk. BHP has no right to drill the Gallegos Canyon Unit Well No. 391 in the NE/4 of Section 23 and in so doing, illegally trespassed on Mrs. Locke's lands and has and/or will damage her property interests in the N/2 of Section 23.

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PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES
(Name and expertise)

EST. TIME

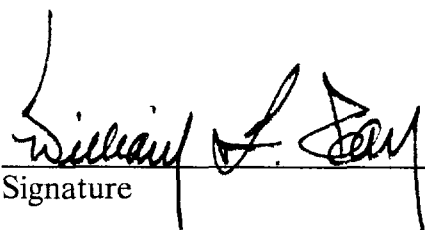
EXHIBITS

Ewell N. Walsh, (Petroleum Engineer)

20 Min.

Approximately 5

PROCEDURAL MATTERS


Signature