

CAMPBELL & BLACK, P.A.  
LAWYERS

JACK M. CAMPBELL  
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SUITE 1 - 110 NORTH GUADALUPE  
POST OFFICE BOX 2208  
SANTA FE, NEW MEXICO 87504-2208  
TELEPHONE: (505) 988-4421  
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July 24, 1991

HAND-DELIVERED

William J. LeMay, Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
State Land Office Building  
Santa Fe, New Mexico 87503

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JUL 24 1991

OIL CONSERVATION DIVISION

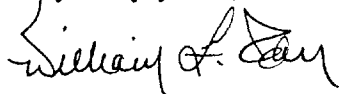
Re: Oil Conservation Division Case No. 10353:-  
Application of Collins & Ware, Inc. for Compulsory Pooling, Lea County,  
New Mexico

Dear Mr. LeMay:

Collins & Ware, Inc. hereby requests that the above-referenced case scheduled for hearing before a Division Examiner on July 25, 1991 be continued to the Examiner hearings scheduled for August 8, 1991.

Your attention to this request is appreciated.

Very truly yours,



WILLIAM F. CARR

WFC:mlh

cc: Mr. Bill Seltzer  
W. Thomas Kellahin, Esq.

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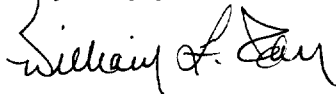
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**STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION**

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

CASE NO. 10353

APPLICATION OF COLLINS & WARE,  
INC. FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.

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OIL CONSERVATION DIVISION  
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**PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Campbell & Black, P.A., as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Collins & Ware, Inc. \_\_\_\_\_  
c/o Bill Seltzer \_\_\_\_\_  
214 W. Texas Ave., Suite 507 \_\_\_\_\_  
Midland, Texas 79701 \_\_\_\_\_  
(915) 684-5381 \_\_\_\_\_  
name, address, phone and  
contact person

**ATTORNEY**

William F. Carr, Esq. \_\_\_\_\_  
Campbell & Black, P.A. \_\_\_\_\_  
Post Office Box 2208 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_  
(505) 988-4421 \_\_\_\_\_

**OPPOSITION OR OTHER PARTY**

Chevron USA, Inc. \_\_\_\_\_  
Post Office Box 1150 \_\_\_\_\_  
Midland, Texas 79702 \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
name, address, phone and  
contact person

**ATTORNEY**

W. Thomas Kellahin, Esq. \_\_\_\_\_  
Kellahin, Kellahin & Aubrey \_\_\_\_\_  
Post Office Box 2265 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_  
(505) 982-4285 \_\_\_\_\_



**PROPOSED EVIDENCE**

APPLICANT

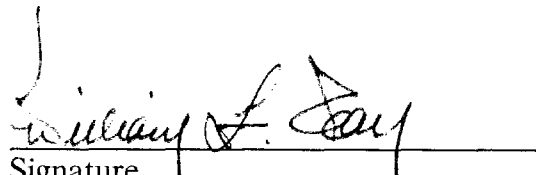
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Bill Seltzer, Landman	10 Min.	Approximately 5
Herb Ware, III, Geologist	15 Min.	Approximately 3

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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**PROCEDURAL MATTERS**

(Please identify any procedural matters which need to be resolved prior to hearing)

  
Signature

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

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**STATEMENT OF CASE**

**APPLICANT**

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

Collins & Ware, Inc., Applicant in the above-captioned cause, seeks an order pooling all mineral interests from the surface to the base of the Morrow formation underlying the W/2 of Section 20, Township 22 South, Range 33 East, forming a standard 320-acre gas spacing and proration unit for any and all formations and/or pools within said vertical extent developed on 320-acre spacing, which presently includes but is not necessarily limited to the Undesignated East Red Tank-Atoka Gas Pool and Undesignated Bootleg Ridge-Morrow Gas Pool. Said unit is to be dedicated to a well to be drilled at a standard gas well location thereon. 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.

**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.)

**PROPOSED EVIDENCE**

**APPLICANT**

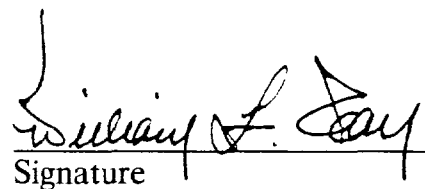
<b>WITNESSES</b> (Name and expertise)	<b>EST. TIME</b>	<b>EXHIBITS</b>
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**OPPOSITION**

<b>WITNESSES</b> (Name and expertise)	<b>EST. TIME</b>	<b>EXHIBITS</b>
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**PROCEDURAL MATTERS**

(Please identify any procedural matters which need to be resolved prior to hearing)

  
Signature