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:

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IN THE MATTER OF CASE 10530 BEING REOPENED CASE NO. -11176-PURSUANT TO THE PROVISIONS OF ORDER R-9722, AS AMENDED, WEST LOVINGTON-STRAWN POOL, LEA COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by LARRY C. SQUIRES AND SNYDER RANCHES, INC., as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

INTERESTED PARTY

ATTORNEY

Snyder Ranches, Inc Larry Squires P. O. Box 2158 Hobbs, New Mexico 88240-2158 (505) 393-7544 W. Thomas Kellahin KELLAHIN AND KELLAHIN P.O. Box 2265 Santa Fe, New Mexico 87504 (505) 982-4285 Pre-Hearing Statement Case No. 11176 Page 2

OTHER PARTIES

ATTORNEY

Charles Gillespie, Jr.

Jim Bruce, Esq. P. O. Box 2068 Santa Fe, New Mexico 87504 (505) 982-4554

STATEMENT OF CASE

Snyder Ranches Inc (Larry C. Squires) is the mineral owner of the oil and gas minerals underlying

T15S, R35E Sec 34: W/2SW/4 & SW/4NW/4

T16S, R36E Sec 6: Lots 3,4 and 5

all of which is currently under lease now held by Charles B. Gillespie, Jr. and all of which is subject to the current special rules and regulations for the West Lovington-Strawn Oil Pool

Snyder Ranches Inc. (Larry C. Squires) supports making the 80-acre spacing rules permanent

Pre-Hearing Statement Case No. 11176 Page 3

PROPOSED EVIDENCE

SNYDER RANCHES:

WITNESSES

EST. TIME

EXHIBITS

None at this time

PROCEDURAL MATTERS

None anticipated at this time.

KELLAHIN AND KELLAHIN

By: W. Thomas Kellanin

P.O. Box 2265 Santa Fe, New Mexico 87504 (505) 982-4285

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

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

IN THE MATTER OF CASE NO. 10,530 BEING REOPENED PURSUANT TO THE PROVISIONS OF ORDER NO. R-9722, LEA COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Charles B. Gillespie, Jr. as required by the Oil Conservation Division.

APPEARANCE OF PARTIES:

Applicant:

Attorney:

Other Party:

Attorney:

Charles B. Gillespie, Jr. James Bruce Post Office Box 8 Hinkle, Cox, Eaton, Midland, Texas 79702 Coffield & Hensley Attention: William R. Crow Post Office Box 2068 (915) 683-1765 Santa Fe, New Mexico 87504-2068 (505) 982-4554

Snyder Ranches, Inc. W. Thomas Kellahin Kellahin & Kellahin Post Office Box 2265 Santa Fe, New Mexico 87504-2265 Pre-Hearing Statement NMOCD Case No. 10,350 (Reopened) Page 2

David Petroleum Corp.

William F. Carr Campbell, Carr, Berge & Sheridan Post Office Box 2208 Santa Fe, New Mexico 87504-2208

STATEMENT OF CASE:

Applicant:

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Other Party:

Mr. Gillespie requests that 80 acre spacing for the pool be made permanent.

PROPOSED EVIDENCE

Applicant:

WITNESS	ESTIMATED TIME		EXHIBITS
Kevin Widner (Engineer)	15 minutes	(a) (b)	Pressure data Permeability data
		(C)	Production data
William R. Crow (Geologist)	5 minutes	(a) (b)	Structure map Porosity isopach
Opposition:			
WITNESS	ESTIMATED TIME		EXHIBITS

PROCEDURAL MATTERS

Pre-Hearing Statement NMOCD Case No. 10,530 (Reopened) Page 3

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD & HENSLEY

James Bruce Post Office Box 2068 Santa Fe, New Mexico 87504-2068 (505) 982-4554

Attorneys for Charles B. Gillespie, Jr.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Pre-Hearing Statement was transmitted via facsimile this 127^{-1} day of January, 1995, and mailed by first-class mail, postage prepaid to:

W. Thomas Kellahin, Esq. Kellahin & Kellahin Post Office Box 2265 Santa Fe, New Mexico 87504-2265 Fax: 982-2047

and

William F. Carr, Esq. Campbell, Carr, Berg & Sheridan Post Office Box 2208 Santa Fe, New Mexico 87504-2208 Fax: 983-6043

James Bruce

gllspie.phs

KELLAHIN AND KELLAHIN

W. THOMAS KELLAHIN*

*NEW MEXICO BOARD OF LEGAL SPECIALIZATION RECOGNIZED SPECIALIST IN THE AREA OF NATURAL RESOURCES-OIL AND GAS LAW

JASON KELLAHIN (RETIRED 1991)

ATTORNEYS AT LAW EL PATIO BUILDING 117 NORTH GUADALUPE POST OFFICE BOX 2265 SANTA FE, NEW MEXICO 87504-2265

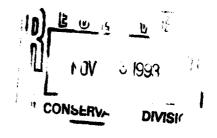
November 3, 1994

TELEPHONE (505) 982-4285 TELEFAX (505) 982-2047

DAC

HAND DELIVERED

Mr. David R. Catanach, Hearing Examiner Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87504



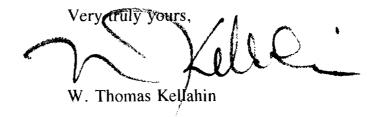
Re: **REQUEST FOR CONTINUANCE**

NMOCD Case 10530 (Reopened)
Pool Rule hearing for the
West Lovington-Strawn Pool
Lea County, New Mexico

Dear Mr. Catanach:

On behalf of Larry C. Squires and Snyder Ranches, Inc., affected interest owners, please find enclosed our Entry of Appearance in the referenced case which is now set for an Examiner's hearing on November 10, 1994.

In addition, we are requesting that this case be continued until the hearing scheduled for December 1, 1994 so that we would have an opportunity to obtain and review data requested from Charles B Gillespie, Jr. an operator in the pool and the applicant for these special rules.



cc: Larry Squires

cc: Via facsimile to: Jim Bruce, Esq. Attorney for Gillespie

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

IN THE MATTER OF CASE NO. 10530 BEING REOPENED PURSUANT TO THE PROVISIONS OF ORDER NOS. R-9722 AND R-97722-A WEST LOVINGTON-STRAWN POOL, LEA COUNTY, NEW MEXICO

D) B W & L NOV & 1993 CONSERVA DIVISIO

CASE 10530

ENTRY OF APPEARANCE <u>AND</u> REQUEST FOR CONTINUANCE

Comes now LARRY C. SQUIRES and SNYDER RANCHES, INC., by its attorneys, Kellahin and Kellahin, and enters its appearance in these cases as interested parties.

In addition, Larry C. Squires and Snyder Ranches, Inc. requests that this case be continued from November 10, 1994 to the Examiner Docket now scheduled for December 1, 1994 in order to provide these parties with an opportunity to obtain data from Charles B. Gillespie, Jr. and to analysis that data and prepare for hearing.

W. Thomas Kellahin

W. Thomas Kellahin Kellahin & Kellahin P. O. Box 2265 Santa Fe, New Mexico 87504 (505) 982-4285

CERTIFICATE OF MAILING

I certify that a copy of this pleading we transmitted by facsimile to counsel for Gillespie this 3rd day of November, 1994. W. Thomas Kellahin