

HINKLE, COX, EATON, COFFIELD & HENSLEY

LEWIS C. COX
PAUL W. EATON
CONRAD E. COFFIELD
HAROLD L. HENSLEY JR.
STUART D. SHANOR
ERIC D. LANPHERE
C. D. MARTIN
PAUL J. KELLY, JR.
ROBERT P. TINNIN, JR.
MARSHALL G. MARTIN
OWEN M. LOPEZ
DOUGLAS L. LUNSFORD
JOHN J. KELLY
NICHOLAS J. NOEDING
T. CALDER EZZELL, JR.
WILLIAM B. BURFORD*
RICHARD E. OLSON
RICHARD R. WILFONG*
THOMAS J. MCBRIDE
STEVEN D. ARNOLD
JAMES J. WECHSLER
NANCY S. CUSACK
JEFFREY L. FORNACIARI
JEFFREY D. HEWETT
JAMES BRUCE
JERRY F. SHACKELFORD*
JEFFREY W. HELLBERG*
ALBERT L. PITTS
THOMAS M. HNASKO
JOHN C. CHAMBERS*
GARY D. COMPTON*
MICHAEL A. GROSS
THOMAS D. HAINES, JR.
GREGORY J. NIBERT
DAVID T. MARKETTE*
MARK C. DOW

KAREN M. RICHARDSON*
FRED W. SCHWENDIMANN
JAMES H. HUDSON
JEFFREY S. BAIRD*
MACDONNELL, GORDON
REBECCA NICHOLS JOHNSON
WILLIAM P. JOHNSON
STANLEY K. KOTOVSKY, JR.
H. R. THOMAS
KARA L. KELLOGG

BETTY H. LITTLE*
RUTH S. MUSGRAVE
ELLEN S. CASEY
S. BARRY PAISNER
MARGARET CARTER LUDEWIG
STEPHEN M. CRAMPTON
MARTIN MEYERS
GREGORY S. WHEELER
ANDREW J. CLOUTIER
JAMES A. GILLESPIE
GARY W. LARSON
STEPHANIE LANDRY
JOHN R. KULSETH, JR.
MARGARET R. MCNETT
BRIAN T. CARTWRIGHT*
LISA K. SMITH*
JAMES KENT SCHUSTER*
ROBERT H. BETHEA*
BRADLEY W. HOWARD
CHARLES A. SUTTON*
NORMAN D. EWART
DARREN T. GROCE*
MOLLY MCINTOSH

ATTORNEYS AT LAW
218 MONTEZUMA
POST OFFICE BOX 2068
SANTA FE, NEW MEXICO 87504-2068
(505) 982-4554
FAX (505) 982-8623

CLARENCE E. HINKLE (904-1985)
W. E. BONDURANT, JR. (913-1973)
ROY C. SNOODGRASS, JR. (914-1987)

OF COUNSEL
O. M. CALHOUN*
MACK EASLEY
JOE W. WOOD
RICHARD S. MORRIS

WASHINGTON, D.C.
SPECIAL COUNSEL
ALAN J. STATMAN

700 UNITED BANK PLAZA
POST OFFICE BOX 10
ROSWELL, NEW MEXICO 88202
(505) 622-6510
FAX (505) 623-9332

2800 CLAYDESTA CENTER
6 DESTA DRIVE
POST OFFICE BOX 3580
MIDLAND, TEXAS 79702
(915) 683-4691
FAX (915) 683-6518

1700 TEAM BANK BUILDING
POST OFFICE BOX 9238
AMARILLO, TEXAS 79105
(806) 372-5569
FAX (806) 372-9761

500 MARQUETTE N.W., SUITE 800
POST OFFICE BOX 2043
ALBUQUERQUE, NEW MEXICO 87103
(505) 768-1500
FAX (505) 768-1529

*NOT LICENSED IN NEW MEXICO

September 18, 1992

VIA HAND DELIVERY

Florene Davidson
Oil Conservation Division
State Land Office Building
Santa Fe, New Mexico 87503

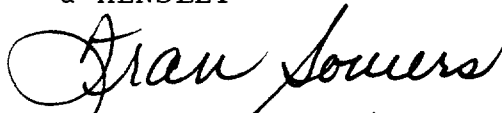
Re: Application of Bird Creek Resources, Inc., et al.,
for Special Pool Rules, Eddy County, New Mexico
Case No. 10,541

Dear Florene:

Attached are the original and two copies of a Pre-Hearing Statement for filing on behalf of Santa Fe Energy Operating Partners, L.P. in the above-referenced case.

Very truly yours,

HINKLE, COX, EATON, COFFIELD
& HENSLEY


Fran Sowers, Secretary
to James Bruce

Attachments

JGB5\92230.c

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. 10,541

APPLICATION OF BIRD CREEK RESOURCES,
INC., *ET AL.*, FOR SPECIAL POOL RULES,
EDDY COUNTY, NEW MEXICO.

RECEIVED

SEP 1 1992

PRE-HEARING STATEMENT OIL CONSERVATION DIVISION

This pre-hearing statement is submitted by Santa Fe Energy Operating Partners, L.P.
as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

Bird Creek Resources, Inc.,
Ray Westall Operating, Inc.

ATTORNEY

William F. Carr

OPPOSITION OR OTHER PARTY

Bass Enterprises Production
Company

ATTORNEY

W. Thomas Kellahin

Santa Fe Energy Operating
Partners, L.P.
Suite 1330
550 West Texas
Midland, Texas 79701
(915) 687-3551
Attention: Gary Green

James Bruce
Hinkle, Cox, Eaton, Coffield
& Hensley
Post Office Box 2068
Santa Fe, New Mexico 87504-2068
(505) 982-4554

STATEMENT OF CASE

APPLICANT

OPPOSITION

Santa Fe Energy Operating Partners, L.P. owns interests within a mile of the subject pool, and thus is an interested party.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OTHER PARTY

WITNESSES

EST. TIME


EXHIBITS

Santa Fe Energy Operating Partners, L.P. does not plan on presenting any witnesses.

PROCEDURAL MATTERS

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD
& HENSLEY

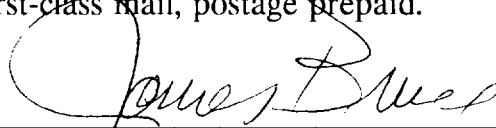


James Bruce
Post Office Box 2068
Santa Fe, New Mexico 87504-2068
(505) 982-4554

Attorneys for Santa Fe Energy Operating Partners,
L.P.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Pre-Hearing Statement was mailed to William F. Carr, Esq., Post Office Box 2208, Santa Fe, New Mexico 87504-2208, and W. Thomas Kellahin, Esq., Post Office Box 2265, Santa Fe, New Mexico 87504-2265, this 18th day of September, 1992, by first-class mail, postage prepaid.



James Bruce

**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. 10541

THE CONSOLIDATED APPLICATION OF
BIRD CREEK RESOURCES, FORTSON OIL
COMPANY AND RAY WESTALL OPERATING, INC.
FOR SPECIAL POOL RULES,
EDDY COUNTY, NEW MEXICO.

RECEIVED
SEP 25 1992
OIL CONSERVATION DIV.
SANTA FE

PRE-HEARING STATEMENT

This prehearing statement is submitted by William F. Carr, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Bird Creek Resources
Ray Westall Operating, Inc.
c/o Randy Harris
Box 4
Loco Hills, New Mexico 88255
(505) 677-2370

name, address, phone and
contact person

ATTORNEY

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

OTHER PARTIES

Hanley Petroleum Inc.
Bass Enterprises Production Co.

name, address, phone and
contact person

ATTORNEY

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

OTHER PARTIES

Santa Fe Energy Operating
Partners, L.P.

name, address, phone and
contact person

ATTORNEY

James G. Bruce, Esq.
Hinkle, Cox, Eaton, Coffield & Hensley
Post Office Box 2068
Santa Fe, New Mexico 87504

(505) 982-4554

STATEMENT OF CASE

APPLICANT

The applicants in the above styled cause, seek an Order promulgating temporary special rules for a six month period of time for the East Herradura Bend-Delaware Pool including a provision for a limiting gas-oil ratio of 10,000 cubic feet of gas per barrel of oil. Said pool is located in the southeastern portion of Township 22 South, Range 28 East, and the northeastern portion of Township 23 South, Range 28 East.

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.)

1. [Introduction](#)
2. [Background](#)
3. [Methodology](#)

4. [Results and Discussion](#)
5. [Conclusion](#)

6. [References](#)
7. [Appendix](#)

8. [Acknowledgments](#)
9. [Funding](#)
10. [Conflicts of Interest](#)

11. [Data Availability Statement](#)
12. [Ethics Statement](#)
13. [Author Contributions](#)

14. [Supplementary Material](#)

15. [References](#)

PROPOSED EVIDENCE

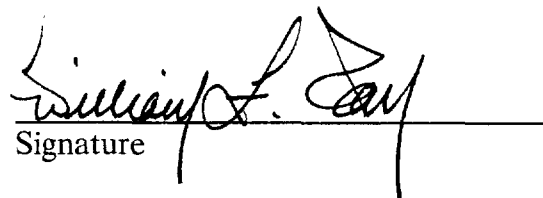
APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Randy Harris, Geologist	20 Minutes	Approximately 7
Rex Howell, Petroleum Engineer	15 Minutes	Approximately 2

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
-----------------------------------	-----------	----------

PROCEDURAL MATTERS


Signature

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

IN THE MATTER OF THE CONSOLIDATED
APPLICATION OF BIRD CREEK RESOURCES,
FORTSON OIL COMPANY AND
RAY WESTALL OPERATING, INC.,
FOR SPECIAL POOL RULES,
EDDY COUNTY, NEW MEXICO.

CASE NO. 10541

RECEIVED
SEP 23 1992
OIL CONSERVATION DIVISION

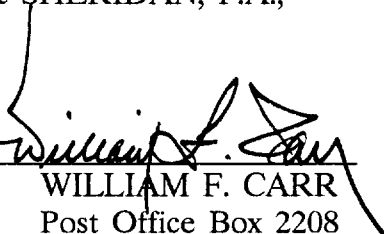
ENTRY OF APPEARANCE

COMES NOW CAMPBELL, CARR, BERGE & SHERIDAN, P.A., and hereby
enters its appearance in the above referenced case on behalf of Harvey E. Yates
Company.

Respectfully submitted,

CAMPBELL, CARR, BERGE
& SHERIDAN, P.A.,

By:


WILLIAM F. CARR
Post Office Box 2208
Santa Fe, New Mexico 87504
Telephone: (505) 988-4421

ATTORNEYS FOR HARVEY
E. YATES COMPANY

THE COURT HAS CONSIDERED THE MATTER.

DEPARTMENT OF STATE, WASHINGTON, D. C. 20520

THE DIRECTOR OF THE BUREAU OF
 RECORDS OF BIRTH, DEATH AND
 MARRIAGE OF COMPANY AND
 THE ASSOCIATED OPERATING AND
 MAINTENANCE POOL RULES,
 BUREAU OF STATE, NEW MEXICO

14

THE COURT HAS CONSIDERED THE MATTER.

THE NEW CAMPBELL COUNTY COURT OF RECORDS OF BIRTH, DEATH AND
 MARRIAGE OF COMPANY AND THE ASSOCIATED OPERATING AND
 MAINTENANCE POOL RULES, BUREAU OF STATE, NEW MEXICO

THE COURT HAS CONSIDERED THE MATTER.

THE COURT HAS CONSIDERED THE MATTER.

14

THE COURT HAS CONSIDERED THE MATTER.

THE COURT HAS CONSIDERED THE MATTER.

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

IN THE MATTER OF THE CONSOLIDATED
APPLICATION OF BIRD CREEK RESOURCES,
FORTSON OIL COMPANY AND
RAY WESTALL OPERATING, INC.,
FOR SPECIAL POOL RULES,
EDDY COUNTY, NEW MEXICO.

RECEIVED
SEP 23 1992
OIL CONSERVATION DIVISION

CASE NO. 10541

ENTRY OF APPEARANCE

COMES NOW CAMPBELL, CARR, BERGE & SHERIDAN, P.A., and hereby
enters its appearance in the above referenced case on behalf of Harvey E. Yates
Company.

Respectfully submitted,

CAMPBELL, CARR, BERGE
& SHERIDAN, P.A.,

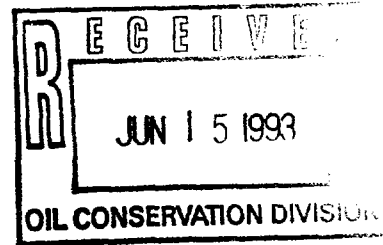
By: 

WILLIAM F. CARR
Post Office Box 2208
Santa Fe, New Mexico 87504
Telephone: (505) 988-4421

ATTORNEYS FOR HARVEY
E. YATES COMPANY

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:



IN THE MATTER OF CASE NO. 10,541
BEING REOPENED PURSUANT TO THE
PROVISIONS OF DIVISION ORDER
NO. R-9773.

CASE NO. 10,541 (Reopened)

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Pogo Producing Company as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

OTHER PARTY

Collins & Ware
Suite 2200
303 West Wall
Midland, Texas 79701
(915) 687-3435
Attention: Herb Ware

Bass Enterprises Production
Company; and

Fortson Oil Company

ATTORNEY

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

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

Pogo Producing Company
Post Office Box 10340
Midland, Texas 78702
(915) 682-6822

James Bruce
Hinkle, Cox, Eaton, Coffield
& Hensley
Post Office Box 2068
Santa Fe, New Mexico 87504-2068
(505) 982-4554

STATEMENT OF CASE

APPLICANT

OTHER PARTY

Pogo Producing Company is an interest owner in the area of the subject pool.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES

EST. TIME

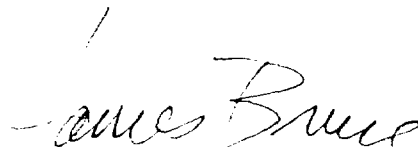
EXHIBITS

Pogo Producing Company does not plan on presenting testimony.

PROCEDURAL MATTERS

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD
& HENSLEY



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

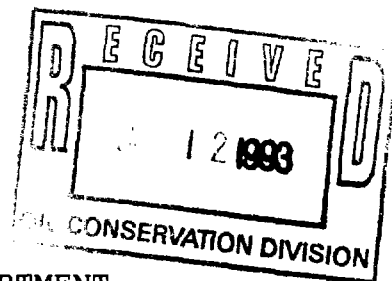
Attorneys for Pogo Producing Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Pre-Hearing Statement was hand-delivered to William F. Carr, Esq., Campbell, Carr, Berge & Sheridan, 111 N. Guadalupe, Santa Fe, New Mexico, and W. Thomas Kellahin, Esq., Kellahin & Kellahin, 117 N. Guadalupe, Santa Fe, New Mexico, this 15th day of June, 1993.

A handwritten signature in cursive script, appearing to read "James Bruce", is written above a horizontal line.

James Bruce



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. 10541(Reopened)

IN THE MATTER OF CASE 10541 BEING
REOPENED PURSUANT TO ORDER R-9773,
EAST HERRADURA BEND-DELAWARE OIL POOL
EDDY COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by FORTSON OIL
COMPANY AND HANLEY PETROLEUM INC. as required by the Oil
Conservation Division.

APPEARANCE OF PARTIES

OTHER PARTY

Fortson Oil Company
301 Commerce St. Suite 301
Fort Worth, Texas 76102
Attn: John Tittl
(800) 878-3300

Hanley Petroleum Inc
415 West Wall, Suite 1500
Midland, Texas 79701
Attn: Jim Rogers

ATTORNEY

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

Pre-Hearing Statement
Case No. 10541
Page 2

OTHER PARTIES

ATTORNEY

Collins & Ware

William F. Carr, Esq.

Pogo Producing Company

James Bruce, Esq.

STATEMENT OF CASE

FORTSON OIL COMPANY AND HANLEY PETROLEUM INC.:

Fortson Oil Company and Hanley Petroleum Inc. support the continuation of the special rules and regulations for the East Herradura Bend-Delaware Oil Pool including a 10,000 to 1 GOR for an additional temporary period of one year.

PROPOSED EVIDENCE

WITNESSES

EST. TIME

EXHIBITS

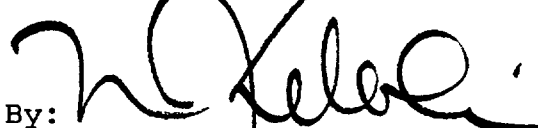
Possible witness:

John Tittl (P.E.)

20 Min.

unknown

KELLAHIN AND KELLAHIN



By:

W. Thomas Kellahin

P.O. Box 2265

Santa Fe, New Mexico 87504

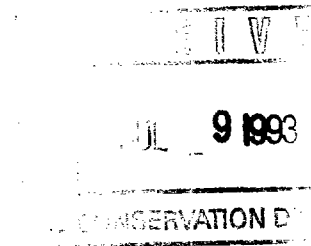
(505) 982-4285

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

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

CASE NO. 10541

IN THE MATTER OF CASE 10541 BEING
REOPENED PURSUANT TO THE PROVISIONS
OF DIVISION ORDER NO. R-9773, WHICH
ORDER PROMULGATED SPECIAL POOL RULES
FOR THE EAST HERRADURA BEND-DELAWARE
POOL IN EDDY COUNTY, NEW MEXICO.



PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANTS

Ray Westall Operating, Inc. _____
Bird Creek Resources _____
Collins & Ware, Inc. _____
c/o William F. Carr _____

name, address, phone and
contact person

ATTORNEY

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

OPPOSITION OR OTHER PARTY

Fortson Oil Company _____

name, address, phone and
contact person

ATTORNEY

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

STATEMENT OF CASE

APPLICANT

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

Applicants will appear and present testimony in support of a request to extend the temporary pool rules for the East Herradura Bend-Delaware Pool for an additional one year period of time.

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

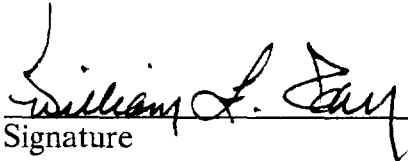
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Rex Howell, Petroleum Engineer	15 Min.	Approximately 6

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
-----------------------------------	-----------	----------

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

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

IN THE MATTER OF CASE NO. 10,541
BEING REOPENED PURSUANT TO THE
PROVISIONS OF DIVISION ORDER
NO. R-9773.

CASE NO. 10,541 (Reopened)

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Pogo Producing Company as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

OTHER PARTY

Collins & Ware
Suite 2200
303 West Wall
Midland, Texas 79701
(915) 687-3435
Attention: Herb Ware

Bass Enterprises Production
Company; and

Fortson Oil Company

ATTORNEY

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

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

Pre-Hearing Statement
NMOCD Case No. 10,541 (Reopened)
Page 2

Pogo Producing Company
Post Office Box 10340
Midland, Texas 78702
(915) 682-6822

James Bruce
Hinkle, Cox, Eaton, Coffield
& Hensley
Post Office Box 2068
Santa Fe, New Mexico 87504-2068
(505) 982-4554

STATEMENT OF CASE

APPLICANT

OTHER PARTY

Pogo Producing Company is an interest owner in the area of the subject pool.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES

EST. TIME

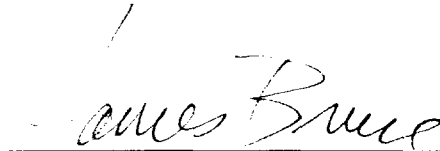
EXHIBITS

Pogo Producing Company does not plan on presenting testimony.

PROCEDURAL MATTERS

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD
& HENSLEY

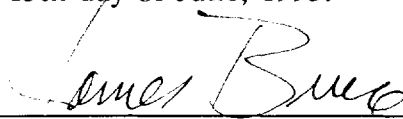
A handwritten signature in cursive script, appearing to read "James Bruce", is written over a horizontal line.

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

Attorneys for Pogo Producing Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Pre-Hearing Statement was hand-delivered to William F. Carr, Esq., Campbell, Carr, Berge & Sheridan, 111 N. Guadalupe, Santa Fe, New Mexico, and W. Thomas Kellahin, Esq., Kellahin & Kellahin, 117 N. Guadalupe, Santa Fe, New Mexico, this 15th day of June, 1993.

A handwritten signature in cursive script, appearing to read "James Bruce", is written over a horizontal line.

James Bruce