LAW OFFICES

TANSENNEOSEBROUGH, GERDING & STROTHER, P.C.

621 WEST ARRINGTON

52 FARMINGTON, NEW MEXICO 87401

OF COUNSEL Charles M. Tansey P M9 1, - 20 Sp.

TELECOPIER: (505) 325-4675

Douglas A. Echols Richard L. Gerding Connie R. Martin Michael T. O'Loughlin James B. Payne Tommy Roberts Haskell D. Rosebrough Robin D. Strother Karen L. Townsend

Mailing Address: P. O. Box 1020 Farmington, N.M. 87499

October 8, 1992

State of New Mexico Energy, Minerals and Natural Resources Department New Mexico Oil Conservation Division P.O. Box 2088 Santa Fe, New Mexico 87501-2088

Attn: William J. Lemay, Director

Application of SG Interests I, Ltd. for Compulsory Pooling, San Juan County, New Mexico. Case No. 10567

Dear Mr. Lemay:

Enclosed please find Applicant's Pre-hearing Statement in the above-referenced matter.

Sincerely,

Johnny Roberts
Tommy Roberts

TR:mkc Encl.

Richard T. C. Tully, Esq. cc: John McKenzie Don Moris Davis Tommy Key

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:

RECEIVED

OCT 1 3 1992

OIL CONSERVATION DIVISION CASE NO. 10567

APPLICATION OF SG INTERESTS I, LTD. FOR COMPULSORY POOLING, SAN JUAN COUNTY, NEW MEXICO.

APPLICANT

PRE-HEARING STATEMENT

This prehearing statement is submitted by SG Interests I, Ltd. as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

ATTORNEY

Tommy Roberts
P.O. Box 1020
Farmington, NM 87499
505/325-1801
ATTORNEY
Richard T. C. Tully, Esq.
P.O. Box 268
Farmington, NM 87499
505/327-3388

Pre-hearing Statement NMOCD Case No. 10567 Page Two

John McKenzie	Not Known
c/o Don Henderson	
6220 N.W. 83rd Street	
Oklahoma City, OK 63132	
Don Moris Davis	Not Known
c/o Texas Southwest Property	
P.O. Box 163622	
Austin, Texas 76716-3622	
Tommy Key	Not Known
c/o Keys Ranch	
Avery, Texas 75554	
name, address, phone and contact person	

Pre-hearing Statement NMOCD Case No. 10567 Page Three

STATEMENT OF CASE

APPLICANT

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

Applicant, in the above-styled cause, seeks an order pooling all mineral interests in the Basin-Fruitland Coal (Gas) Pool underlying Lots 3 and 4, the E/2SW/4 and the SE/4 (S/2 equivalent) of Section 30, Township 29 North, Range 10 West, forming a 319.80-acre gas spacing and proration unit for said pool. Said unit is to be dedicated to a well to be drilled at a standard coal gas well location in the SW/4 of said Section 30. 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 the operator of the well and a charge for risk involved in drilling said well. Said unit is located approximately 3 miles east-southeast of Bloomfield, New Mexico.

OPPOSITION OR OTHER PARTY

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

NOT APPLICABLE

Pre-hearing Statement NMOCD Case No. 10567 Page Four

PROPOSED EVIDENCE

APPLICANT

	WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
1)	James B. Fullerton Landman	20 min.	Land & ownership plats, correspondence, and others as deemed necessary
2)	Mickey O'Hare Petroleum Engineer	20 min.	Authority for Expenditure, Operating Agreement, exhibits applicable to the issue of risk, and others as deemed necessary

OPPOSITION

WITNESSES EST. TIME EXHIBITS (Name and expertise)

NOT APPLICABLE

Pre-hearing Statement NMOCD Case No. 10567 Page Five

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

NONE

Johnny Roberto TOMMY ROBERTS, Attorney for

SG Interests I, Ltd.

Dated: October 8, 1992