LAW OFFICES

## HOISIVIC M OIL CONSERTANSEY, ROSEBROUGH, GERDING & STROTHER, P.C.

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October 22, 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

William J. Lemay, Director Attn:

Re: Application of SG Interests I, Ltd. for Compulsory Pooling, San Juan County, New Mexico. Case No. 10585

Dear Mr. Lemay:

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

Sincerely,

Johny Roberts

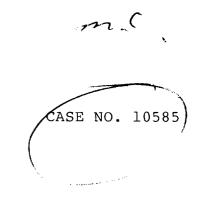
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cc: F. B. Umbarger Estate

# 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:

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



#### PRE-HEARING STATEMENT

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

#### APPEARANCES OF PARTIES

APPLICANT	ATTORNEY	
SG INTERESTS I, LTD.	Tommy Roberts	
811 Dallas, Suite 1505	P.O. Box 1020	
Houston, Texas 77002	Farmington, NM 87499	
713/951-0100	505/325-1801	
name, address, phone and contact person		
OPPOSITION OR OTHER PARTY	ATTORNEY	
F. B. Umbarger Estate	Unknown	
Address Unknown		
name, address, phone and contact person		

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#### 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 the W/2 of Section 26, Township 29 North, Range 11 West, forming a standard 320-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 26. 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 1.5 miles 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

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#### 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

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

NONE

SG Interests I, Ltd.

Dated: October 22, 1992