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

RECEIVED

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

OIL CONSERVATION DIVISION

CASE NO. 10622

APPLICATION OF SEA COAST, INC. FOR COMPULSORY POOLING, SAN JUAN COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This Prehearing Statement is submitted by William F. Carr, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

| APPLICANT | ATTORNEY |
|---|--|
| Sea Coast, Inc. c/o Mike Briggs Post Office Box 50418 Amarillo, Texas 79159-0418 (806) 354-0145 name, address, phone and contact person | William F. Carr Campbell, Carr, Berge & Sheridan, P.A Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421 |
| OPPOSITION OR OTHER PARTY | ATTORNEY |
| | |
| name, address, phone and contact person | |

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STATEMENT OF CASE

APPLICANT

Sea Coast, Inc., applicant in the above-styled cause, seeks an order pooling all mineral interests from the surface to the base of the Pictured Cliffs formation in Section 6, Township 29 North, Range 12 West, and in the following described manner: Lots 6 and 7, the E/2 SW/4 and SE/4 (S/2 equivalent) to form a standard 317.98-acre gas spacing and proration unit for any and all formations and/or pools developed on 320-acre spacing within said vertical extent (which presently includes only the Basin-Fruitland Coal (Gas) Pool and Lots 6 and 7 and the E/2 SW/4 (SW/4 equivalent) to form a standard 157.98acre gas spacing and proration unit for any and all formations and/or pools developed on 160-acre spacing within said vertical extent (which presently includes but is not necessarily limited to the Undesignated Crouch Mesa-Fruitland Sand Pool, Undesignated West Kutz-Fruitland Sand Pool and Fulcher Kutz-Pictured Cliffs Pool. Said units are to be dedicated to a single 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, and a charge for risk involved in drilling said well. Applicant also requests that Marlex Resources, Inc. be designated operator of the 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.)

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PROPOSED EVIDENCE

APPLICANT

WITNESSES EST. TIME EXHIBITS

(Name and expertise)

Mike Briggs or
Jim Sullins, Landman 10 Min. Approximately 5

Mickey O'Hare, Engineer 10 Min. Approximately 3

OPPOSITION

WITNESSES EST. TIME EXHIBITS (Name and expertise)

PROCEDURAL MATTERS

Signature