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March 31, 1993

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DARREN L. BROOKS
CHRISTINE E. LALE
PAUL G. NASON

PAUL G NASON DARLA M. SILVA

Dear Mr. Catanach:

Enclosed are an original and two copies of Pre-Hearing Statements for Case No. 10,666 (Application of Santa Fe Energy Operating Partners, L.P. for Compulsory Pooling, a Non-Standard Gas Spacing and Proration Unit, and an Unorthodox Gas Well Location, Eddy County, New Mexico) and Case No. 10,692 (Application of Pogo Producing Company for Special Pool Rules, Eddy County, New Mexico).

Very truly yours,

HINKLE, COX, EATON, COFFIELD & HENSLEY

∄ames Bruce

JB:frs Enclosures

VIA HAND DELIVERY

JGB5\93661.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. 10,666

APPLICATION OF SANTA FE ENERGY OPERATING PARTNERS, L.P. FOR COMPULSORY POOLING, A NON-STANDARD GAS SPACING AND PRORATION UNIT, AND AN UNORTHODOX GAS WELL LOCATION, EDDY COUNTY, NEW MEXICO.

#### PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Applicant as required by the Oil Conservation Division.

#### APPEARANCE OF PARTIES

**APPLICANT** 

**ATTORNEY** 

Santa Fe Energy Operating Partners, L.P. Suite 1330 500 West Texas Midland, Texas 79701 (915) 687-3551 Attention: Curtis D. Smith James Bruce
Hinkle, Cox, Eaton, Coffield
& Hensley
Post Office Box 2068
Santa Fe, New Mexico 87504-2068
(505) 982-4554

OPPOSITION OR OTHER PARTY

**ATTORNEY** 

Pre-Hearing Statement NMOCD Case No. 10,666 Page 2

#### STATEMENT OF CASE

### **APPLICANT**

Applicant's proposed well will be drilled to test the Morrow formation. Under the McMillan-Morrow Gas Pool rules, wells are spaced on 640 acres with wells to be drilled no closer than 1,650 feet to a section line. A Morrow well in the NW¼ of the section has drained the W½ of the section, and thus applicant requests a non-standard unit consisting of the E½. Interests in the section are uniform, and thus there is no adverse effect on correlative rights. Applicant's proposed location, 1980' FSL and 660' FEL, is standard for a 320 acre unit. Applicant's location is based on geology and a desire to move away from the existing well in the NW¼.

The compulsory pooling portion of the application will be dismissed.

## **OPPOSITION**

#### PROPOSED EVIDENCE

## **APPLICANT**

	WITNESSES	EST. TIME	EXHIBITS
1.	Curtis Smith (Landman)	10 minutes	<ul> <li>(a) Land plat</li> <li>(b) McMillan-Morrow Pool Rules</li> <li>(c) Affidavit Regarding Notice</li> </ul>
2.	Gene Davis (Geologist)	5 minutes	(a) Morrow isopach
OPPOSITION			
	WITNESSES	EST. TIME	EXHIBITS

## PROCEDURAL MATTERS

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD & HENSLEY

Jame's Bruce

Post Office Box 2068

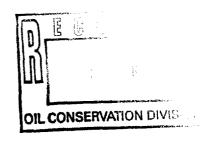
Santa Fe, New Mexico 87504-2068 (505) 982-4554

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

## BEFORE THE

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

IN THE MATTER OF THE APPLICATION OF SANTA FE ENERGY OPERATING PARTNERS, L.P. FOR COMPULSORY POOLING, AN UNORTHODOX GAS WELL LOCATION AND A NON-STANDARD GAS SPACING AND PRORATION UNIT, EDDY COUNTY, NEW MEXICO.



CASE NO. 10666

### **ENTRY OF APPEARANCE**

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

Respectfully submitted,

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

WILLIAM F. CARR Post Office Box 2208

Santa Fe, New Mexico 87504 Telephone: (505) 988-4421

ATTORNEYS FOR ENRON OIL & GAS COMPANY

## CERTIFICATE OF MAILING

I hereby certify that I have caused to be mailed a copy of our Entry of Appearance in the above-captioned case to:

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

on this 1993 day of April, 1993.

ENTRY OF APPEARANCE, PAGE 2