

**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. 11116

APPLICATION OF SOUTHLAND ROYALTY  
COMPANY FOR COMPULSORY POOLING  
AND AN UNORTHODOX COAL GAS LOCATION,  
SAN JUAN COUNTY, NEW MEXICO.

8/100/1  
100/1

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by SOUTHLAND  
ROYALTY COMPANY as required by the Oil Conservation Division.

**APPEARANCE OF PARTIES**

**APPLICANT**

Southland Royalty Company  
P.O.Box 4289  
Farmington, New Mexico 87499  
Attn: Alan Alexander  
1-505-326-9757

**ATTORNEY**

W. Thomas Kellahin  
KELLAHIN AND KELLAHIN  
P.O. Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285

**STATEMENT OF CASE**

**APPLICANT:**

Southland Royalty Company is the operator of all of irregular Section 10, T32N, R11W, NMPM, in the Basin Fruitland Coal Gas Pool. Said well is located approximately 6 1/2 miles north west of Cedar Hills, New Mexico.

Southland Royalty Company seeks approval for an order to pool all mineral interests forming a standard 355.60-acre coal-gas spacing and proration unit.

Said unit is to be dedicated to Southland Royalty Company's Maddox Com Well No. 100 which is to be drilled at an unorthodox "off pattern" coal gas well location 1905 feet FSL and 1210 feet FEL (Unit 1) of said Section 10.

Also to be considered will be the costs of participation in said well, including but not limited to the costs of drilling completing and operation the well and allocation of those costs, income, actual operation costs and charges for supervision and the designation of applicant as the operator of the well.

**PROPOSED EVIDENCE**


APPLICANT

WITNESSES	EST. TIME	EXHIBITS:
Chip Lane (Senior Reservoir Engineer)	20 min.	7 total
Paul Basinski (Senior Staff Geologist)	20 min.	
Dean Price (Senior Landman)	10 min.	

**PROCEDURAL MATTERS**

None anticipated at this time.

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 DIVISION

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

CASE NO. 11016

IN THE MATTER OF THE APPLICATION OF  
TEXACO EXPLORATION AND PRODUCTION INC.  
FOR CREATION OF A NEW POOL IN THE TUBB  
FORMATION, CLASSIFICATION OF THIS POOL  
AS AN ASSOCIATED OIL AND GAS POOL AND  
FOR THE PROMULGATION OF SPECIAL POOL RULES,  
LEA 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**

**APPLICANT**

Texaco Exploration and Production Inc.  
c/o Todd Moehlenbrock  
Post Office Box 3109  
Midland, TX 79702  
(915) 688-4662

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

**OTHER PARTY**

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\_\_\_\_\_  
\_\_\_\_\_

name, address, phone and  
contact person

**ATTORNEY**

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**STATEMENT OF CASE**

**APPLICANT**

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

Texaco Exploration and Production Inc., applicant in the above-styled cause, seeks the creation of a new pool in the NW/4 of Section 9, Township 23 South, Range 37 East, to be classified as an "associated pool" and to adopt the "General Rules and Regulations for the Associated Oil and Gas Pools in Northwest and Southeast New Mexico", as promulgated by Division Order No. R-5353, as amended, as the governing procedures for said pool and to include provisions for 40-acre oil and 160-acre gas spacing and proration units. Further, applicant requests an increased gas-oil ratio limitation of 6,000 cubic feet of gas per barrel of oil for said pool.

**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
Bill Hay, Geologist	15 Min.	Approximately 2
Todd Moehlenbrock, Petroleum Engineer	30 Min.	Approximately 8

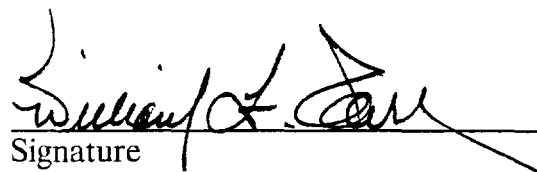
OTHER PARTY

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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**PROCEDURAL MATTERS**

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

Texaco will request that Cases 11016, 11017 and 11018 be consolidated for purposes of testimony.

  
Signature