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OIL CONSERVATION DIV. SANTA FE

# 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. 9995

APPLICATION OF SENDERO PETROLEUM, INC. FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO

(name, address, phone and contact person)

## PRE-HEARING STATEMENT

This pre-hearing statement is submitted by SENDERO PETROLEUM, INC. as required by the Oil Conservation Division.

## APPEARANCE OF PARTIES

APPLICANT ATTORNEY (name, address, phone and contact person) Kurt Boley Karen Aubrey Kellahin, Kellahin & Aubrey Sendero Petroleum, Inc. One Wall Plaza Executive Post Office Box 2265 Suites Santa Fe, New Mexico 87504 306 West Wall, Suite 1200 Midland, Texas 79701 (505) 982-4285 (915) 684-4561 OPPOSITION OR OTHER PARTY ATTORNEY

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OIL CONSERVATION DIV. SANTA FE

Pre-hearing Statement NMOCD Case No. 9995 Page 2

# STATEMENT OF CASE

<u>APPLICANT</u> (please make a concise statement of what is being sought with this application and the reasons therefore.)

Sendero Petroleum, Inc. seeks a compulsory pooling order for the proposed recompletion of a well at an unorthodox location 660 feet from the South line and 660 feet from the East line of Section 8, T21S, R23E, Eddy County, New Mexico. Said location was previously approved by the Division in Order NSL2809.

Sendero has been unable despite its efforts to obtain voluntary commitment from all of the working interest owners involved in recompleting this well and now needs a compulsory pooling order.

#### 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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Pre-hearing Statement NMOCD Case No. 9995 Page 3

OIL CONSERVATION DIV. SANTA FE

# PROPOSED EVIDENCE

### APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
Kurt Boley (geologist)	15 min.	Location map Ownership map
Jim Cauther (landman)	15 min.	Tabulation of ownership List of parties and interest to be pooled Correspondence with parties

Correspondence with parties AFE/overhead costs Structure map Cross section map

## OPPOSITION

WITNESSES	EST. TIME	EXHIBITS
(name and expertise)		

#### PROCEDURAL MATTERS

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

None.

KELLAHIN, KELLAHIN & AUBREY

By:

Karen Aubrey Post Office Box 2265 Santa Fe, New Mexico 87504 (505) 982-4285

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OIL CONSERVATION DIV. SANTA FE

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Kurt BoleyKaren AubreySendero Petroleum, Inc.Kellahin, Kellahin & AubreyOne Wall Plaza ExecutivePost Office Box 2265SuitesSanta Fe, New Mexico 87504306 West Wall, Suite 1200(505) 982-4285

(915) 684-4561

OPPOSITION OR OTHER PARTY (name, address, phone and contact person) ATTORNEY

ATTORNEY

Pre-hearing Statement NMOCD Case No. 9995 Page 2

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# PROCEDURAL MATTERS

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

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KELLAHIN, KELLAHIN & AUBREY l. By: Karen Aubrey

EXHIBITS

Post Office Box 2265 Santa Fe, New Mexico 87504 (505) 982-4285