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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. 9997

APPLICATION OF TXO PRODUCTION  
CORP. FOR COMPULSORY POOLING  
BROWN FEDERAL COM NO. 1 WELL  
E/2 SECTION 20, T29S, R25E,  
EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by TXO  
PRODUCTION CORP. as required by the Oil Conservation  
Division.

**APPEARANCE OF PARTIES**

APPLICANT  
(name, address, phone  
and contact person)

ATTORNEY

TXO Production Corp.  
415 West Wall, Suite 900  
Midland, Texas 79701-4468  
Attn: Mr. Richard H. Coats  
(915) 682-7992

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

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

ATTORNEY

**STATEMENT OF CASE**

APPLICANT

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

TXO Production Corp. seeks a compulsory pooling order for the drilling of a well at a standard well location in the E/2 of Section 20, T19S, R25E, Eddy County, New Mexico in order to test for production from a 320-acre spaced pool, any 160-acre spaced pool and any 80 or 40-acre spaced pool.

TXO has been unable despite its efforts to obtain voluntary commitment from all of the working interest owners involved in 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)

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
Tom Hill (landman)	15 min.	Location map
Corky Vickers (petroleum engineer)	10 min.	Ownership map
Glen Brown (geologist)	20 min.	Tabulation of ownership List of parties and interest to be pooled Correspondence with parties AFE/overhead costs Risk factor penalty geology on primary objective

OPPOSITION

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 the hearing)

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin  
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