

RECEIVED

MILLER, STRATVERT, TORGERSON & SCHLENKER, P. A.

LAW OFFICES

'90 JUL 6 PM 2 39

RANNE B. MILLER
WILLIAM K. STRATVERT
ALAN C. TORGERSON
KENDALL O. SCHLENKER
ALICE TOMLINSON LORENZ
GREGORY W. CHASE
ALAN KONRAD
MARGO J. MCCORMICK
LYMAN G. SANDY
STEPHEN M. WILLIAMS
STEPHAN M. VIDMAR
ROBERT C. GUTIERREZ
SETH V. BINGHAM
MICHAEL H. HOSES
JAMES B. COLLINS
TIMOTHY R. BRIGGS
WALTER R. PARR
THOMAS S. UDALL
RUDOLPH LUCERO
DANIEL E. RAMCZYK
DEAN G. CONSTANTINE

DEBORAH A. SOLOVE
GARY L. GORDON
H. KEVIN HAIGHT
LAWRENCE R. WHITE
SHARON P. GROSS
VIRGINIA ANDERMAN
C. K. MOSS
JAMES B. COONEY
LEONARD J. PADILLA
TIMOTHY S. VASQUEZ
MARTE D. LIGHTSTONE
BRADFORD K. GOODWIN
NICHOLAS CULLANDER
JOHN R. FUNK
J. SCOTT HALL
THOMAS R. MACK
MICHAEL J. HAPPE
DENISE BARELA SHEPHERD
MICK I. R. GUTIERREZ
JOHN H. MILLER

ALBUQUERQUE
500 MARQUETTE, N. W., SUITE 1100
POST OFFICE BOX 25687
ALBUQUERQUE, NM 87125
TELEPHONE: (505) 842-1950
FACSIMILE: (505) 243-4408

FARMINGTON
300 WEST ARRINGTON
POST OFFICE BOX 869
FARMINGTON, NM 87499
TELEPHONE: (505) 326-4521
FACSIMILE: (505) 325-5474

LAS CRUCES
277 EAST AMADOR
POST OFFICE BOX 1231
LAS CRUCES, NM 88004
TELEPHONE: (505) 523-2481
FACSIMILE: (505) 526-2215

SANTA FE
125 LINCOLN AVE., SUITE 303
POST OFFICE BOX 1986
SANTA FE, NM 87504-1986
TELEPHONE: (505) 989-9614
FACSIMILE: (505) 989-9657

KENNETH R. BRANDT (1946 - 1981)

July 6, 1990

PLEASE REPLY TO SANTA FE

Mr. Michael Stogner
New Mexico Oil Conservation Division
310 Old Santa Fe Trail
Santa Fe, New Mexico 87501

HAND DELIVERED

Re: NMOCD Case Nos. 10003, 10004; 9980; 9981; 9982; 9983;
9984; 9985; 9986 - Application of Mesa Operating Limited
Partnership for Compulsory Pooling, San Juan County, New
Mexico.

Dear Mr. Stogner:

Enclosed are two copies of consolidated Pre-Hearing Statements
for each of the above cases (for a total of eighteen copies) for
your case files.

As of today, I have no indication that any of these cases will
be opposed. However, Amoco may enter its appearance in certain
cases.

We hope to consolidate some of the cases for hearing. I will
advise you in advance of the hearing which cases we will request
to be consolidated.

Very truly yours,



J. Scott Hall

JSH/ro

cc: William F. Carr, Esq.

OIL CONSERVATION DIVISION
RECEIVED
JUL 6 PM 2 40
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. 10003; 10004; 9980;
9981; 9982; 9983; 9984; 9985; 9986

APPLICATION OF MESA OPERATING
LIMITED PARTNERSHIP FOR COMPULSORY
POOLING, SAN JUAN COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This prehearing statement is submitted by Applicant
as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Mesa Operating Limited Partnership

Mr. Mark Seale

P. O. Box 2009, Amarillo TX 79189-2009

(806) 378-1000

name, address, phone and
contact person

OPPOSITION OR OTHER PARTY

Amoco Production Company

El Paso Production Company

Conoco, Inc.

name, address, phone and
contact person

ATTORNEY

J. Scott Hall

Miller, Stratvert, Torgerson & Schlenker, PA

125 Lincoln Ave., Suite 303, Santa Fe, NM 8750

(505) 989-9614

ATTORNEY

STATEMENT OF CASE

APPLICANT

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

Applicant seeks pooling of unjoined interests in Fruitland coal formation. In each case, Applicant seeks 156% risk penalty.

It is believed that Amoco will enter its appearance for purposes of requesting that risk penalty be limited to 156%. Otherwise, no opposition is known.

Applicant will ask that certain cases be consolidated for purposes of testimony. Absent opposition, it is estimated that all cases can be heard in two hours.

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
Mark Seale Landman	10 min.	3 (location plat; AFE; JOA; joinder letters)
Stuart Samson Geophysicist	10 min.	3 (isopachs; contours)
Tom Hahn Petroleum Engineer	10 min.	2 (production data; well costs)

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
-----------------------------------	-----------	----------

PROCEDURAL MATTERS

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



Signature