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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. 10016

APPLICATION OF ORYX ENERGY COMPANY,  
INC. FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

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

**APPEARANCE OF PARTIES**

APPLICANT  
(name, address, phone  
and contact person)

Oryx Energy Company  
Post Office Box 2880  
Dallas, Texas 75221  
Attn: Charles Gray  
(214) 890-6259

ATTORNEY

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

OPPOSITION OR OTHER PARTY  
(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.)

Oryx Energy Company seeks an order pooling all mineral interests from the top of the Wolfcamp to the base of the Morrow formation, including, but not limited to the South Shoe Bar Atoka Gas Pool and an Undesignated Morrow Gas Pool, for a well to be drilled at a standard location on Section 23, T17S, R35E, Lea County, New Mexico.

Oryx has been unable despite its efforts to obtain voluntary commitment from all of the working interest owners involved in drilling 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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**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
Keith Nelson (landman)	15 minutes	Location map Tabulation of Ownership
Shelly Lane (geologist)	15 minutes	List of parties and interest to be pooled Correspondence with parties AFE/overhead costs Structure map Cross section Joint Operating Agreement Seismic data

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