

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. 10069

APPLICATION OF PACIFIC ENTERPRISES  
OIL COMPANY (USA) TO LIMIT THE  
APPLICATION OF NEW MEXICO OIL  
CONSERVATION DIVISION ORDER NO. R-928,  
AND TO ESTABLISH STATEWIDE GAS WELL  
SPACING, EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by  
KELLAHIN, KELLAHIN & AUBREY as required by the Oil  
Conservation Division.

**APPEARANCE OF PARTIES**

**APPLICANT**

(name, address, phone  
and contact person)

Craig Clark  
Pacific Enterprises Oil  
Company, USA  
P.O. Box 3083  
Midland, TX 79701  
(915) 684-3861

**ATTORNEY**

W. Thomas Kellahin  
Kellahin, Kellahin & Aubrey  
P.O. Box 2265  
Santa Fe, NM 87504  
(505) 982-4285

**OPPOSITION OR OTHER PARTY**

(name, address, phone  
and contact person)

**ATTORNEY**

**RECEIVED**

AUG 31 1990

OIL CONSERVATION DIV.  
SANTA FE

**STATEMENT OF CASE**

APPLICANT

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

Order limiting the Application of Order R-928 to the SW/4 of Section 15, E/2 of Section 21 and the NW/4 of Section 22, T17S, R31E and to establish statewide spacing (320 acres) within one mile of the geographical limits of the Fren-Pennsylvanian Gas Pool, including, but not limited to Section 16, T17S, R31E.

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
Craig Clark (landman)	5 min.	1
Rick Ricketts (geologist)	10 min.	3
Paul Lerwick (engineer)	20 min.	2

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)

None.

KELLAHIN, KELLAHIN & AUBREY

By: 

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