

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. 10105

APPLICATION OF ANADARKO PETROLEUM  
CORPORATION FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by  
ANADARKO PETROLEUM CORPORATION as required by the Oil  
Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

(name, address, phone  
and contact person)

Anadarko Petroleum Corp.  
P.O. Box 2497  
Midland, Texas 79702  
(915) 682-1666  
Attn: Mr. Michael Goode

ATTORNEY

Candace Hamann Callahan  
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

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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.)

Anadarko Petroleum Corporation seeks an order pooling all mineral interests from the top of the Wolfcamp formation to the base of the Pennsylvanian formation, including, but not limited to the Loco Hills South Morrow Pool, or 11,500 feet subsurface, whichever is deeper, underlying the W/2 Section 28, T17S, R30E, N.M.P.M., Eddy County, New Mexico.

Anadarko has sought the voluntary agreement of the owners of the non-consenting working interests, for the formation of appropriate spacing and proration units, and has been able to obtain voluntary agreement with the exception of Union Texas Exploration Corporation.

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
Michael Goode (landman)	15 min.	Surface ownership plat Tabulation of interest owners and percentages Operating agreement AFE
Rick Erickson	15 min.	Geologic maps Production maps

OPPOSITION

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
None anticipated.		

**PROCEDURAL MATTERS**

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

KELLAHIN, KELLAHIN & AUBREY

By: 

Candace Hamann Callahan  
Post Office Box 2265  
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(505) 982-4285