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

LAW OFFICES

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 WALTER R PARR THOMAS S. UDALL RUDOLPH LUCERO DANIEL E. RAMCZYP 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 NANCY AUGUSTUS

ALBUQUERQUE

500 MARQUETTE, N. W., SUITE 1100 POST OFFICE BOX 25687 ALBUQUERQUE, NM 87/25 RECEIVED TELEPHONE: (505) 842-1950 FACSIMILE: (505) 243-4408

POST OFFICE BOX 869

FARMINGTON, NM 87499

TELEPHONE (505) 326-4521

FACSIMILE: (505) 325-5474

OCT 1 % 1990

LAS CRUCES

277 EAST AMADOR POST OFFICE BOX (23) LAS CRUCES, NM 88004 TELEPHONE: (505) 523-2481 FACSIMILE: (505) 526-2215

OIL CONSERVATION DIVISION WEST ARRINGTON SANTA FF

125 LINCOLN AVE., SUITE 303 POST OFFICE BOX 1986 SANTA FE. NM 87504-1986 TELEPHONE: (505) 989-9614 FACSIMILE: (505) 989-9857

KENNETH R. BRANDT (1946 - 1981)

October 12, 1990

PLEASE REPLY TO SANTA FE

Mr. William J. LeMay, Director New Mexico Oil Conservation Division 310 Old Santa Fe Trail Santa Fe. New Mexico 87501

HAND DELIVERED

NMOCD Case Nos. 10117, 10118, 10119, 10120, 1121, 10123, 10124, 10125 - Application of Mesa Operating Limited Partnership for Compulsory Pooling, San Juan County, New

Dear Mr. LeMay:

Enclosed are the original and two copies of the Applicant's Consolidated Pre-Hearing Statement in the above matter.

Very truly yours,

J. Scott Hall

Z. Sweethall

JSH/rom

Hank Wood

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:

RECEIVED

00 t 1 :: 1990

QIL CONSERVATION DIVISION NO. 10117, 10118, 10119
10120, 10121, 10123, 10124, 10125

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

name, address, phone and

contact person

CONSOLIDATED PRE-HEARING STATEMENT

| This prehearing statement is sub- | |
|---|--|
| as required by the Oil Conservation Div | rision. |
| APPEARANCE | ES OF PARTIES |
| APPLICANT | ATTORNEY |
| Mesa Operating Limited Partnership | J. Scott Hall |
| Mr. Hank Wood | Miller, Stratvert, Torgerson & Schlenker, P.A. |
| P. O. Box 2009 | P. O. Box 1986 |
| Amarillo, Texas 79189-2009 | Santa Fe, New Mexico 87504-1986 |
| (806) 378–1093 | (505) 989-9614 |
| name, address, phone and contact person | |
| OPPOSITION OR OTHER PARTY | ATTORNEY |
| | |
| | |
| | |
| | |

| Pre-l | 1ea | ring | State | ement |
|-------|-----|------|-------|-------|
| NMO | CD | Case | No. | |
| Page | 2 | | | |

STATEMENT OF CASE

APPLICANT

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

Applicant seeks orders pooling unjoined mineral interests in the Fruitland coal formation, designating Applicant operator, establishing costs of drilling, completion and supervision and risk penalty for drilling the subject wells. All wells are at standard locations.

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.)

| Pre-hea | ring | State | ement |
|---------|------|-------|-------|
| NMOCD | Case | No. | |
| Page 3 | - | | |

PROPOSED EVIDENCE

APPLICANT

| WITNESSES (Name and expertise) | EST. TIME | EXHIBITS |
|-----------------------------------|-----------|------------------------------------|
| Hank Wood, Landman | . 10 | Land plat, JOA/AFE, well proposals |
| Stewart Samson, Geophysicist | 8 · | Isopach, contour |
| Tom Hahn, Petroleum Engineer | 8 | AFE, Production volumes |
| PPOSITION | | |
| | | |

OF

EST. TIME WITNESSES (Name and expertise)

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

::

Certain cases may be consolidated.

Z. Siou thall

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:

RECEIVED

 -0.072 ± 1990

OIL CONSERVATION DIVISION CASE NO. 10121

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

PRE-HEARING STATEMENT

This Pre-hearing statement is submitted by William F. Carr, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

| APPLICANT | ATTORNEY |
|------------------------------------|----------------------------|
| Mesa Operating Limited Partnership | |
| | |
| Telephone: | Telephone: |
| OPPOSITION OR OTHER PARTY | ATTORNEY |
| Nearburg Producing Company | William F. Carr |
| c/o Mark Nearburg | Campbell & Black, P.A |
| 401 E. Illinois, Suite 300 | Post Office Box 2208 |
| Midland, Texas 79701 | Santa Fe, New Mexico 87504 |
| (915) 686-8235 | (505) 988-4421 |
| name, address, phone and | |
| contact person | |

Pre-hearing Statement NMOCD Case No. 10121 Page 2

STATEMENT OF CASE

APPLICANT

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.)

Nearburg will appear in this case but does not intend to call a witness and present testimony.

Pre-hearing Statement NMOCD Case No. 10121 Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES EST. TIME EXHIBITS (Name and expertise)

OPPOSITION

WITNESSES EST. TIME EXHIBITS (Name and expertise)

None.

PROCEDURAL MATTERS

Signature