

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. 10139

APPLICATION OF PACIFIC ENTERPRISES  
OIL COMPANY (USA) FOR COMPULSORY  
POOLING, EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by PACIFIC  
ENTERPRISES OIL COMPANY (USA) as required by the Oil  
Conservation Division.

**APPEARANCE OF PARTIES**

APPLICANT  
(name, address, phone  
and contact person)

M. 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

## STATEMENT OF CASE

### APPLICANT

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

Pacific Enterprises Oil Company (USA) seeks an order pooling all mineral interests from 5000 feet below the surface to the top of the Mississippian Chester Limestone formation or to a depth of 11,200 feet, whichever is deeper, underlying the N/2 of Section 12, T17S, R29E, Eddy County, New Mexico.

Despite its efforts, applicant has been unable to obtain the voluntary agreement of all parties and therefore seeks an order from the Division pooling all interests.

### 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)	10 min.	Correspondence with parties in efforts to obtain voluntary agreement
Rick Ricketts (geologist)	20 min.	Isopach (2) Structure map Cross section map

OPPOSITION

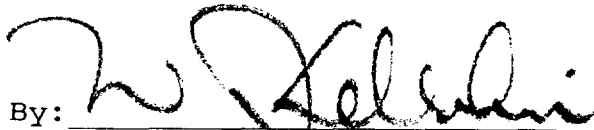
WITNESSES (name and expertise)	EST. TIME	EXHIBITS
-----------------------------------	-----------	----------

**PROCEDURAL MATTERS**

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

None.

KELLAHIN, KELLAHIN & AUBREY

By: 

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

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. 10139

APPLICATION OF ~~PACIFIC~~ ENTERPRISES  
OIL COMPANY (USA) FOR COMPULSORY  
POOLING, EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by PACIFIC  
ENTERPRISES OIL COMPANY (USA) as required by the Oil  
Conservation Division.

APPEARANCE OF PARTIES

APPLICANT  
(name, address, phone  
and contact person)

M. 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

OCT 26 1981

OIL CONSERVATION  
SANTA FE

STATEMENT OF CASE

APPLICANT

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

Pacific Enterprises Oil Company (USA) seeks an order pooling all mineral interests from 5000 feet below the surface to the top of the Mississippian Chester Limestone formation or to a depth of 11,200 feet, whichever is deeper, underlying the N/2 of Section 12, T17S, R29E, Eddy County, New Mexico.

Despite its efforts, applicant has been unable to obtain the voluntary agreement of all parties and therefore seeks an order from the Division pooling all interests.

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)	10 min.	Correspondence with parties in efforts to obtain voluntary agreement
Rick Ricketts (geologist)	20 min.	Isopach (2) Structure map Cross section map

OPPOSITION

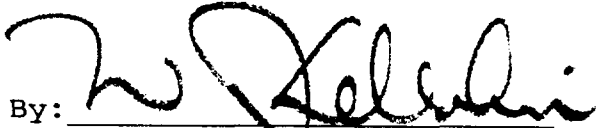
WITNESSES (name and expertise)	EST. TIME	EXHIBITS
-----------------------------------	-----------	----------

**PROCEDURAL MATTERS**

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

None.

KELLAHIN, KELLAHIN & AUBREY

By: 

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