

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. 10169

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

FILED

NOV 2 1980
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.)

Pacific Enterprises Oil Company (USA) seeks an order pooling all mineral interests below the top of the Wolfcamp formation underlying the S/2 of Section 21, T19S, R28E, to form a standard 320-acre gas spacing and proration unit for any and all formations and/or pools developed on 320-acre spacing within said vertical extent which presently includes but is not necessarily limited to the Undesignated South Millman-Atoka Gas Pool, Undesignated Winchester-Atoka Gas Pool, Undesignated Millman-Morrow Gas Pool and Undesignated Winchester-Morrow Gas Pool, said unit to be dedicated to a well to be drilled at a standard gas well location thereon.

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
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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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