

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 THE APPLICATION OF  
MOBIL EXPLORATION & PRODUCING  
U.S., INC. FOR AN UNORTHODOX  
OIL WELL LOCATION AND A NON-STANDARD  
OIL PRORATION UNIT, RIO ARRIBA  
COUNTY, NEW MEXICO.

Case No. 10255

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted on behalf of the applicant Mobil Exploration and Producing U.S., Inc. as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

Applicant: Mobil Exploration & Producing U.S., Inc.

Contact  
Person: Jorge Faz  
Post Office Box 633  
Midland, Texas 79702  
(915) 688-2000

Attorney: W. Perry Pearce  
Montgomery & Andrews, P.A.  
Post Office Box 2307  
Santa Fe, New Mexico 87504  
(505) 982-3873

**RECEIVED**

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OIL CONSERVATION DIV.  
SANTA FE

APPLICANT'S STATEMENT OF THE CASE

Applicant is a party owning an interest in Section 6, Township 24 North, Range 2 West, N.M.P.M., Rio Arriba County, New Mexico. Applicant has the right to drill and proposes to drill a well in the undesignated West Lindrith Gallup-Dakota Oil Pool for its Lindrith "B" Unit Well No. 78 to be located 2,030 feet from the south line and 143 feet from the west line of Section 6. Applicant is the working interest owner in Section 5 to the west of this location. Applicant is moving this well closer to the west line than is permitted under standard rules but is moving that well closer to its own acreage.

APPLICANT'S PROPOSED EVIDENCE

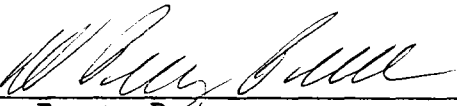
Applicant expects to call one witness, a petroleum engineer at such hearing. At this time, applicant expects to use fewer than 10 exhibits and believes that the direct testimony in this case can be presented in 30 minutes or less.

PROCEDURAL MATTERS

Applicant is not aware of any procedural matters which need to be resolved prior to the hearing of this case.

Respectfully submitted,


MONTGOMERY & ANDREWS, P.A.

By   
W. Perry Pearce  
Post Office Box 2307  
Santa Fe, New Mexico 87504-2307  
(505) 982-3873

Attorneys for Mobil Producing &  
Exploration U.S., Inc.

CERTIFICATE OF SERVICE

I certify that I had a copy of this Pre-Hearing Statement mailed to Jerome P. McHugh, Jerome P. McHugh & Associates, 650 South Cherry Street, Suite 1225, Denver, Colorado 80222 on March 1, 1991.

  
W. Perry Pearce

[WPP/90]