

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. 10052

RECEIVED
AUG 16 1990
OIL CONSERVATION DIVISION

APPLICATION OF

Shell Western E & P

PRE-HEARING STATEMENT

This prehearing statement is submitted by Ernest L. Padilla, Esq.
as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

name, address, phone and
contact person

OPPOSITION OR OTHER PARTY

John H. Hendrix Corporation
Midland Tower Bldg., Suite #525
Midland, Texas 79701
Michael Klein (303) 920-3149

name, address, phone and
contact person

ATTORNEY

ATTORNEY

Ernest L. Padilla, Esq.
P. O. Box 2523
Santa Fe, NM 87504
(505) 988-7577

STATEMENT OF CASE

APPLICANT

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

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.)

John H. Hendrix Corporation opposes the application to the extent that, as an adjoining working interest owner in the Blinebry-Tubb-Drinkard producing zone, it and other working interest owners will suffer drainage if a spacing change from 160 acres to 40 acres is permitted under the application. In addition, a change in allowable will have the effect of allowing Blinebry gas production in the pool to have a considerably higher allowable than wells outside the pool whose allowable on 160 acre spacing will be significantly lower.

John H. Hendrix Corporation takes the position that Blinebry gas allowable and spacing should remain unchanged.

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

Probably none.

PROCEDURAL MATTERS

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

A handwritten signature in black ink, appearing to read "Z. H. Radell", is written over a horizontal line.

Signature

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

RECEIVED

AUG 17 1981

OIL CONSERVATION DIV
SANTA FE

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
DIVISION FOR THE PURPOSE OF
CONSIDERING THE APPLICATION OF
SHELL WESTERN E&P INC. FOR
AMENDMENT OF DIVISION ORDERS
R-8539 AND R-8541, LEA COUNTY,
NEW MEXICO

Case No. 10052

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted on behalf of Shell Western E&P Inc. as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

Applicant: Shell Western E&P Inc.
Post Office Box 576
Houston, Texas 77006
(713) 870-2181

Contact
Person: Tim Fusselman, Esquire

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

APPLICANT'S STATEMENT OF THE CASE

Applicant appears in this case seeking an amendment of Division Order Nos. 8539 and 8541 to eliminate the gas well classification from the special pool rules governing the North Eunice Blinebry-Tubb-Drinkard Oil and Gas Pool and the redesignation of this pool as the North Eunice Blinebry-Tubb-Drinkard Pool. The amendments proposed to Division Order No. 8541, which approved a water flood for the North Drinkard Unit, will be to conform the water flood order to this change.

APPLICANT'S PROPOSED EVIDENCE

Applicant proposes to present three witnesses at the time of this hearing: Ms. Lisa Corder, a Petroleum Geologist; Mr. Bill Lancaster, a Petroleum Engineer; and Mr. Joe Ramey, a Petroleum Engineer. It is expected that these witnesses will have 20 exhibits to present and that the presentation of the direct case will require approximately 45 minutes to 1 hour.

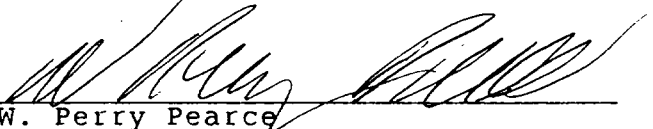
PROCEDURAL MATTERS

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 Shell Western E&P Inc.

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