

**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:

APPLICATION OF ST. MARY LAND &  
EXPLORATION COMPANY FOR STATUTORY  
UNITIZATION, EDDY AND LEA COUNTIES, NEW MEXICO

CASE NO. 12207

OIL CONSERVATION DIV.  
59 JUN 30 PM 3:14

APPLICATION OF ST. MARY LAND & EXPLORATION  
COMPANY FOR APPROVAL OF A WATERFLOOD PROJECT  
AND TO QUALIFY THE PROJECT FOR THE RECOVERED  
OIL TAX RATE PURSUANT TO THE ENHANCED OIL  
RECOVERY ACT, EDDY AND LEA COUNTIES, NEW MEXICO CASE NO. 12208

**PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Campbell, Carr, Berge & Sheridan, P.A.,  
as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

St. Mary Land & Exploration Company  
1776 Lincoln Street, Suite 1100  
Denver, Colorado 80203-1080  
Attn: Ronald D. Boone  
(303) 861-8140

name, address, phone and  
contact person

**ATTORNEY**

James Bruce, Esq.  
3304 Camino Lisa  
Santa Fe, New Mexico 87501  
(505) 982-2043

**Pre-hearing Statement**  
**NMOCD Case No. 12207 and 12208**  
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**OPPOSITION OR OTHER PARTY**

Intoil, Inc.  
Post Office Box 3438  
Englewood, Colorado 80155-3438  
Attn: Joseph Mazzola  
(303) 790-0940  
name, address, phone and  
contact person

**ATTORNEY**

William F. Carr, Esq.  
Campbell, Carr, Berge & Sheridan, P.A.  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421

**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.)

Intoil Inc. will present testimony which shows the proposed unitization is neither fair, reasonable nor equitable to its interests in the unit area.

**PROPOSED EVIDENCE**

**APPLICANT**

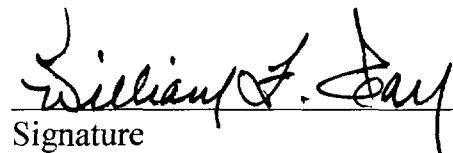
<b>WITNESSES</b> (Name and expertise)	<b>EST. TIME</b>	<b>EXHIBITS</b>
Roy C. Williamson, Jr.	1 hr.	Approximately 7

**OPPOSITION**

<b>WITNESSES</b> (Name and expertise)	<b>EST. TIME</b>	<b>EXHIBITS</b>
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**PROCEDURAL MATTERS**

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

  
\_\_\_\_\_  
Signature

**Pre-hearing Statement**

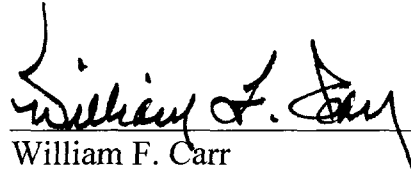
**NMOCD Case No. 12207 and 12208**

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**CERTIFICATE OF MAILING**

I hereby certify that on this 30<sup>th</sup> day of July, 1999, I have caused to be hand-delivered a copy of our Pre-Hearing Statement in the above-captioned cases to the following counsel of record:

James Bruce, Esq.  
612 Old Santa Fe Trail, Suite B  
Santa Fe, New Mexico 87501

  
\_\_\_\_\_  
William F. Carr