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October 11, 2001

Via Facsimile to (505) 476-3462

New Mexico Oil Conservation Division
Attn: Florence Davidson
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505

Re: Case No. 12740

Dear Ms. Davidson:

Please find attached for filing the Prehearing Statement for Seely Oil Company. If you have any questions, please do not hesitate to call. Thank you very much.

Very truly yours,

LOSEE, CARSON, HAAS & CARROLL, P.A.



Hannah Palomin
Secretary to Ernest L. Carroll

Encl.

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

IN THE MATTER OF THE APPLICATION	:	
OF SEELY OIL COMPANY TO EXPAND	:	CASE NO. 12740
THE VERTICAL LIMITS OF THE	:	
UNITIZED FORMATION FOR THE	:	
CENTRAL EK QUEEN UNIT,	:	
LEA COUNTY, NEW MEXICO	:	

PREHEARING STATEMENT

This prehearing statement is submitted by SEELY OIL COMPANY, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Seely Oil Company

ATTORNEY

Ernest L. Carroll
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PARTIES IN INTEREST

State of New Mexico
Commissioner of Public Lands
Attn: Mr. Ray Powell
P.O. Box 1148
Santa Fe, NM 87504-1148

Armstrong Energy Corporation
P.O. Box 1973
Roswell, NM 88202

Patricia Dean Boswell, Trustee
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Fort Worth, TX 76102

Burnett Oil Co, Inc.
Burnett Plaza, Ste 1500, Unit #9
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Fort Worth, TX 76102-6881

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Fort Worth, TX 76102

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Fort Worth, TX 76111

Shirley Davis
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Arlington, TX 76107

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Express Air Drilling, Inc.
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Fort Worth, TX 76116

Thomas J. Maddux
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Fort Worth, TX 76116

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WES-TEX Drilling Company, L.P.
P.O. Box 3739
Abilene, TX 79604

Wolfberry Royalty, Ltd.
P.O. Box 35287
Dallas, TX 75235-0287

STATEMENT OF CASE

Seely Oil Company seeks an order amending the definition of the unitized formation to increase its vertical limits for the Central EK Queen Unit underlying parts of Section 7, 8, 9, 17 and 18 of Township 18 South, Range 34 East, containing 988.40 acres, more or less, of state lands. Applicant does not seek to expand the water injection program approved by the Division in Case Number 10648 and Order No. R-0995-A.

PROPOSED EVIDENCE

WITNESSES	EST. TIME	APPROX. # EXHIBITS
Charles Seely, Petroleum Engineer	20 min.	10
Clarence Stumhoffer, Petroleum Engineer	20 min.	1

LOSEE, CARSON, HAAS & CARROLL, P.A.

By: 
Ernest L. Carroll
P.O. Box 1720
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(505)746-3505

Attorneys for Applicant

I hereby certify that I caused a true and correct copy of the foregoing pleading to be faxed to counsel of record this October 11, 2001.


Ernest L. Carroll