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

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

MAY 1 1995

Oil Conservation Division

CASE NO. 11,262

APPLICATION OF TEXACO EXPLORATION AND PRODUCTION INC. FOR SPECIAL POOL RULES, LEA COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Santa Fe Energy Resources, Inc. as required by the Oil Conservation Division.

APPEARANCE OF PARTIES:

Applicant:

Texaco Exploration and Production Inc.

Other Party:

Santa Fe Energy Resources, Inc. 550 W. Texas, Suite 1330 Midland, Texas 79701 Attention: Gary Green (915) 686-6630

Attorney:

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

Attorney:

James Bruce Hinkle, Cox, Eaton, Coffield & Hensley Post Office Box 2068 Santa Fe, New Mexico (505) 982-4554 Pre-Hearing Statement NMOCD Case No. 11,262 Page 2

STATEMENT OF CASE:

Applicant:

Other Party:

Santa Fe Energy Resources, Inc. is an operator in the subject area and thus is an interested party.

PROPOSED EVIDENCE

Applicant:

WITNESS

ESTIMATED TIME EXHIBITS

Other Party:

WITNESS ESTIMATED TIME EXHIBITS

- No witnesses -

PROCEDURAL MATTERS

Pre-Hearing Statement NMOCD Case No. 11,262 Page 3

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD & HENSLEY, P.L.L.C., Ltd., Co.

James Bruce

Post Office Box 2068

Santa Fe, New Mexico 87504-2068 (505) 982-4554

Attorneys for Santa Fe Energy Resources, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Pre-Hearing Statement was transmitted by hand delivery this day of May, 1995 to:

William F. Carr, Esq. Tanya Trujillo, Esq. Campbell, Carr & Berge, P.A. 110 N. Guadalupe Street Santa Fe, New Mexico 87501

James Bruce