

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

**AMENDED APPLICATION OF  
CONOCOPHILLIPS COMPANY FOR  
AMENDMENT OF DIVISION ORDER NO. R-  
5897 AND SPECIAL RULES FOR THE EAST  
VACUUM GRAYBURG-SAN ANDRES UNIT  
PRESSURE MAINTENANCE PROJECT  
AREA, LEA COUNTY, NEW MEXICO.**

RECEIVED OOD  
2012 MAR 22 P 3:20

**CASE NO. 14775**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by ConocoPhillips Company as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

ConocoPhillips Company

**ATTORNEY**

William F. Carr  
Adam G. Rankin  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile

2/28/12  
WJ

**STATEMENT OF THE CASE**

ConocoPhillips Company seeks an order amending Division Order No. R-5897 and the Special Rules and Regulations for the East Vacuum Grayburg-San Andres Unit Pressure Maintenance Project Area to require that the injection packer be set as close as practically possible to the uppermost injection perforations or casing shoe, provided that the injection packer

set point remains within the unitized interval. Special Rule 11 currently requires that packers be set within 100 feet of the uppermost perforation.

### **APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Cheryl Mnich, Petroleum Geologist	Approx. 15 minutes	Approx. 5
Chibuike Njoku, Petroleum Engineer	Approx. 15 minutes	Approx. 5

### **PROCEDURAL MATTERS**

ConocoPhillips Company is dismissing from its application its request for a unit-wide order increasing the permitted surface injection pressure above the standard 0.2 psi per foot of depth to the uppermost perforation, as currently required by Special Rule 12 in Order No. R-5897.

Respectfully submitted,

HOLLAND & HART, LLP



William F. Carr  
Adam G. Rankin  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile

**ATTORNEYS FOR CONOCOPhillips COMPANY**