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

# APPLICATION OF XTO ENERGY INC. FOR APPROVAL OF EXPANSION OF THE JAMES RANCH UNIT, EDDY COUNTY, NEW MEXICO.

PECEIVED OCD 2011 OCT 19 P 3 110 CASE NO. 15844

# **XTO's PRE-HEARING STATEMENT**

XTO Energy Inc. (XTO), the applicant in the above-referenced cases, submits this Pre-

Hearing Statement pursuant to the rules of the Oil Conservation Division.

### **APPEARANCES**

## **APPLICANT**

# ATTORNEY

XTO Energy Inc. 810 Houston Street Fort Worth, TX 76102 Michael H. Feldewert, Esq. Jordan L. Kessler Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile mfeldewert@hollandhart.com jlkessler@hollandhart.com

## **APPLICANT'S STATEMENT OF THE CASE**

The James Ranch Unit was originally approved by the Oil Conservation Commission in Order R-279 in 1953. Order R-279 approved the unit agreement in principle, which included a unitized interval of all depths. Following a hearing, an amendment to the boundaries was approved by the Division in 1979. XTO now seeks approval to expand the James Ranch Unit by approximately 13,223.68 acres of federal, state, and fee lands in Eddy County, New Mexico. The current unit boundary includes 15,094.41 acres in Eddy County, as follows:

#### Township 22 South - Range 30 East N.M.P.M.

Section 12: N/2SE/4; SW/4SE/4; S/2SW/4; Section 13: NE/4NW/4; W/2W/2 Section 14: All Section 15: All Section 16: All Section 17: E/2; E/2W/2; W/2SW/4 Section 19: Lots 1-4; E/2W/2; E/2 Section 20: All Section 21: All Section 22: All Section 23: All Section 24: W/2NW/4 Section 26: All Section 27: All Section 28: All Section 29: All Section 30: Lots 1-4; E/2W/2; E/2 Section 33: E/2 Section 34: All Section 35: All Section 36: All

# Township 22 South - Range 31 East N.M.P.M.

Section 7: Lot 2 Section 31: Lots 1-4; E/2W/2; E/2

## Township 23 South - Range 30 East N.M.P.M.

Section 1: Lots 1-4; S/2NE/4; SE/4 Section 2: Lots 1-4

#### Township 23 South - Range 31 East N.M.P.M.

Section 5: Lot 4; SW/4NW/4; W/2SW/4 Section 6: Lots 1-7; SE/4NW/4; E/2SW/4; S/2NE/4; SE/4 Section 7: Lots 1-4; E/2W/2; E/2 Section 8: W/2 Section 17: NW/4 Section 18: Lots 1, 2; E/2NW/4; NE/4 The proposed expansion area for the James Ranch Unit consists of approximately 13,223.68 acres of federal, state, and fee acreage, as follows:

#### Township 21 South - Range 30 East N.M.P.M.

Section 25: All Section 26: All Section 27: S/2 Section 33: All Section 34: W/2; NE/4 Section 31: Lots 1-8; E/2W/2; E/2 Section 32: All Section 34: SE/4

#### Township 22 South - Range 29 East N.M.P.M.

Section 1: Lots 1-4; S/2N/2; S/2 Section 11: All Section 12: All Section 13: All Section 14: All

#### Township 22 South - Range 30 East N.M.P.M.

Section 18: Lots 1-4; E/2W/2; E/2 Section 7: Lots 1-4; E/2W/2; E/2 Section 6: Lots 1-7; SE/4NW/4; E/2SW/4; SE/4; S/2NE/4 Section 5: Lots 1-4; S/2N/2; S/2 Section 4: Lots 1-4; S/2N/2; S/2 Section 3: Lots 1-4; S/2N/2; S/2 Section 10: All Section 9: All Section 8: All Section 17: W/2NW/4

XTO has received preliminary approval of the Unit Agreement for the expanded James Ranch Unit from the Bureau of Land Management and the State Land Office. The additional acreage XTO seeks to add to the unitized area is currently within a wildcat pool, and there is no existing production in the proposed expansion area. The unitized interval will not change.

#### APPLICANT'S PROPOSED EVIDENCE

WITNESS<br/>Name and ExpertiseESTIMATED TIMEEXHIBITSKenneth Hilger,<br/>LandmanApprox. 15Approx. 6Tom Anderson,<br/>GeologistApprox. 10Approx. 4

# PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART LLP

By:

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## ATTORNEY FOR XTO ENERGY INC.