

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

**APPLICATION OF HILCORP ENERGY  
COMPANY FOR AN EXCEPTION TO THE  
WELL DENSITY REQUIREMENTS OF THE  
SPECIAL RULES AND REGULATIONS FOR  
THE BLANCO-MESAVERDE GAS POOL,  
RIO ARriba COUNTY, NEW MEXICO.**

**RECEIVED OCD  
2018 JAN -4 P 3:58  
CASE NO. 15937**

**HILCORP'S PREHEARING STATEMENT**

Hilcorp Energy Company, ("Hilcorp") (OGRID No. 372171), through its undersigned counsel, hereby submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Hilcorp Energy Company  
1111 Travis St.  
Houston, Texas 77002

**ATTORNEYS**

Michael H. Feldewert, Esq.  
Adam G. Rankin, Esq.  
Jordan L. Kessler, Esq.  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile

## STATEMENT OF THE CASE

Hilcorp seeks an exception to the well density requirements of Rule I.B of the Special Rules and Regulations of the Blanco-Mesaverde Gas Pool to permit it to complete and simultaneously produce five Mesaverde gas well in the same standard spacing and proration unit, and three wells in the same quarter section.

Hilcorp is the operator of a standard 282.48-acre, more or less, spacing and proration unit in the Blanco-Mesaverde Gas Pool comprised of the S/2 S/2 and Lots 1, 2, 3, and 4 of Section 12, Township 28 North, Range 6 West, Rio Arriba County, New Mexico, in which the following four wells are currently completed and producing:

- a. San Juan 28-6 Unit 20 Well (API No. 30-039-07463), Sec. 12, T28N, R6W (Unit L);
- b. San Juan 28-6 Unit 20R Well (API No. 30-039-21180), Sec.12 , T28N, R6W, (Unit M)
- c. San Juan 28-6 Unit 136M Well (API: 30-039-29357), Sec. 12, T28N, R6W (Unit J); and
- d. San Juan 28-6 Unit 20A Well (API: 30-039-21687), Sec. 12, T28N, R6W (Unit P).

Hilcorp now proposes to simultaneously dedicate and produce the following fifth well within the same standard spacing and proration unit, at the following location: **San Juan 28-6 Unit 136F Well** (API No. 30-039-29973), Sec. 12, T28N, R6W (Lot I).

Hilcorp therefore requests that the Division enter an order granting an exception to the well density requirements of Rule 1.B of the Special Rules and Regulations of the Blanco-Mesaverde Pool to authorize Hilcorp to simultaneously dedicate and produce the San Juan 28-6

Unit 136F Well within the S/2 S/2 and Lots 1, 2, 3, and 4 of Section 12, Township 28 North, Range 6 West, permitting the total number of wells dedicated and producing within this spacing and proration unit to five, and the number of wells within the same quarter section to three.

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

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Chuck Creekmore – Landman	Approx. 10	Approx. 5
Eddie Pippin – Geologist	Approx. 20	Approx. 5
Michelle Sivadon – Reservoir Engineer	Approx. 20	Approx. 5
Brad Pearson – Landman	Approx. 20	Approx. 12
Wyn McCubbin – Landman	Approx. 20	Approx. 12

#### **PROCEDURAL MATTERS**

Hilcorp has filed numerous similar applications for exceptions to the density provisions of the Special Rules and Regulations of the Blanco-Mesaverde Pool. For administrative efficiency and ease of presentation, Hilcorp respectfully requests that the following cases be consolidated for purposes of presenting evidence and testimony:

- 15934, 15936, 15937, 15938, 15939, 15940, 15941, 15942, 15943, 15944, 15945.

Hilcorp has filed amended applications for Case Nos. 15932, 15933 and 15935, so those cases will be necessarily continued until the January 25, 2017 docket.

Respectfully submitted,

HOLLAND & HART LLP

A handwritten signature in black ink, appearing to read 'M. Feldewert', is positioned above a horizontal line.

Michael H. Feldewert

Adam Rankin

Jordan L. Kessler

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

Email: [mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)

Email: [agrankin@hollandhart.com](mailto:agrankin@hollandhart.com)

Email: [jlkessler@hollandhart.com](mailto:jlkessler@hollandhart.com)

**ATTORNEYS FOR HILCORP ENERGY COMPANY**