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

**APPLICATION OF HILCORP ENERGY  
COMPANY FOR AUTHORITY TO  
DOWNHOLE COMMINGLE EXISTING  
PRODUCTION FROM THE BASIN DAKOTA  
POOL WITH THE BLANCO-MESAVERDE IN  
THE SAM COOLEY NO. 1 WELL (API NO.  
30-045-09671), LOCATED IN UNIT L,  
SECTION 9, TOWNSHIP 30 NORTH, RANGE  
11 WEST, NMPM, SAN JUAN COUNTY, NEW  
MEXICO.**

**CASE NO. 20425**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by Hilcorp Energy Company ("Hilcorp") as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Hilcorp Energy Company  
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Houston, Texas 77002

**ATTORNEY**

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**OTHER PARTY**

Diana C. Mesch (Trust)  
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**ATTORNEY**

## **STATEMENT OF THE CASE**

Hilcorp seeks an order authorizing it to downhole commingle existing production from the Basin Dakota Pool (71599) with production from the Blanco-Mesaverde Pool (72319) in the **Sam Cooley No. 1 Well** (API No. 30-045-09671), located in Unit L, Section 9, Township 30 North, Range 11 West, NMPM, San Juan County, New Mexico, pursuant to Division Rule 19.15.12.11(E) NMAC.

Pursuant to Division Rule 19.15.12.11(E) NMAC, downhole commingling between the Basin Dakota and Blanco-Mesaverde pools has been pre-approved. Under that Rule, operators seeking to downhole commingling pre-approved pools are nevertheless required to file Form C-103 with the district office. Hilcorp filed an administratively complete Form C-103 on July 3, 2018. The Form C-103 submitted by Hilcorp and attached hereto contains all the information necessary to approve this application. Pursuant to 19.15.12.11(C)(2)(f) NMAC, Hilcorp provided personal notice and constructive notice by publication to unlocatable owners. Because Hilcorp received a single protest within the twenty-day protest period, the application has been set for hearing, pursuant to 19.15.4.12(E) NMAC.

## **APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Rob Carlson, Landman	Approx. 20 minutes	Approx. 3

## **PROCEDURAL MATTERS**

In the event that the protestant does not enter an appearance in this case, Hilcorp respectfully requests that the protest and hearing be dismissed and its application for downhole commingling be remanded for administrative approval.

Respectfully submitted,

HOLLAND & HART, LLP

By: 

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**ATTORNEYS FOR HILCORP ENERGY COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that on April 25, 2019, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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Adam G. Rankin, Esq.