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

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

IN THE MATTER OF THE APPLICATION OF CONOCOPHILLIPS COMPANY FOR EXCEPTIONS TO OIL CONSERVATION DIVISION RULES 19.15.16,9 NMAC CONCERNING THE SEALING OFF OF STRATA AND 19.15.16.10(Å) NMAC CONCERNING CASING AND TUBING REQUIREMENTS IN THE RECOMPLETION OF HORIZONTAL WELLS IN THE VACUUM GLORIETA EAST UNIT, LEA COUNTY, NEW MEXICO.

CASE NO. 14562

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP as required by the rules of the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

ConocoPhillips Company Attn: Jalyn N. Fiske 3300 North "A" Street Building 6 #133 Midland, Texas 79705 (432) 688-6813

William F. Carr Esq.
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

STATEMENT OF CASE

APPLICANT

Applicant seeks an order granting an exception to the provisions of Division rules 19.15.16.9 NMAC concerning the sealing of strata and 19.15.16.10(A) NMAC concerning casing and tubing requirements in the recompletion of horizontal wells to enable it to recomplete wells in this Unit with open hole horizontal well bores. The Vacuum Glorieta East Unit,

encompasses portions of Sections 26 through 34 of Township 17 South, Range 35 East and portions of Section 5 of Township 18 South, Range 35 East, N.M.P.M.

PROPOSED EVIDENCE

APPLICANT

WITNESSES ESTIMATED TIME EXHIBITS (Name and Expertise)

Tom Scarborough 10 minutes Approx. 3

Landman

Cheryl Mnich 15 minutes Approx. 7

Geologist

Karen A. Stiles 15 Approx. 8

Engineer Minutes

PROCEDURAL MATTERS

ConocoPhillips Company has none at this time.

William F. Carr

Attorney for ConocoPhillips Company