

**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:**

**IN THE MATTER OF THE APPLICATION OF MACK ENERGY CORPORATION  
FOR A NON-STANDARD WELL LOCATION, CHAVEZ COUNTY, NEW MEXICO,**

**CASE NO. 14591**

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**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**

Mack Energy Corporation  
Attn: Stacy Sanders  
Post Office Box 960  
Artesia, New Mexico 88211-0960

**ATTORNEY**

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

**OPPOSITION**

WesPac Energy, LLC  
8620 N. New Braunfels Ave, Suite 603  
San Antonio, Texas 78217

**ATTORNEY**

**STATEMENT OF CASE**

**APPLICANT**

Mack Energy Corporation has applied for approval of a non-standard oil well location for its K2 State Well No. 1 That was drilled form an unorthodox surface location 180 feet from the North Line and 330 feet from the East Line (Unit A) of Section 36, Township 9 South, Range 29 East , to a standard bottom hole location in the Wolfcamp formation. The well was not successful in the Wolfcamp formation and the well was plugged back and recompleted up hole in the San Andres formation at an unorthodox well location 167 feet from the North Line and 306 feet from

the East Line of said Section 36. This location is approximately 40 miles East/Northeast of Roswell, New Mexico.

### **PROPOSED EVIDENCE**

#### **APPLICANT**

WITNESSES  
(Name and Expertise)

ESTIMATED TIME

EXHIBITS

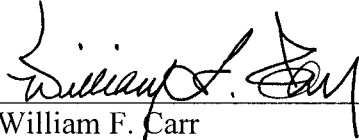
Jerry Sherrell  
Regulatory  
Production Clerk

10 minutes or  
By Affidavit

1

### **PROCEDURAL MATTERS**

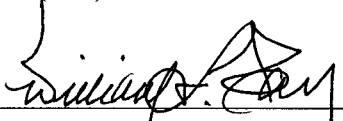
Mack Energy Corporation has none at this time.

  
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William F. Carr  
Attorney for Mack Energy Corporation

### **CERTIFICATE OF SERVICE**

I certify that on January 13, 2011, I served a copy of the foregoing document to the following by facsimile:

Pat Ford  
Authorized Agent  
WesPac Energy, LLC  
8620 N. New Braunfels Ave, Suite 603  
San Antonio, Texas 78217  
FAX NO. (210) 310-3138

  
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William F. Carr