### 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:

CASE NO. 11269

IN THE MATTER OF THE APPLICATION OF AMERADA HESS CORPORATION FOR POOL CREATION, THE PROMULGATION OF SPECIAL POOL RULES, ASSIGNMENT OF AN APPROPRIATE OIL ALLOWABLE, AND FOR AN UNORTHODOX OIL WELL LOCATION LEA COUNTY, NEW MEXICO.

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**Oil Conservation Division** 

## **PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Campbell, Carr & Berge, P.A., as required by the Oil Conservation Division.

### **APPEARANCES OF PARTIES**

APPLICANT

Amerada Hess Corporation c/o Jeff Niemeyer 500 Dallas Street Houston, TX 77002 (713) 609-5475

name, address, phone and contact person

**OPPOSITION OR OTHER PARTY** 

ATTORNEY

William F. Carr, Esq. Campbell, Carr & Berge, P.A. Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421

ATTORNEY

name, address, phone and contact person

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### STATEMENT OF CASE

#### **APPLICANT**

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

Amerada Hess Corporation, applicant in the above-styled cause, seeks the creation of a new pool for the production of oil from the Ellenburger formation underlying all of Section 5, Township 23 South, Range 34 East (being approximately 20.5 miles west-southwest of Eunice, New Mexico) and for the promulgation of special rules and regulations therefor including provisions for 640-acre oil spacing and proration units, designated well location requirements, and for the assignment of an appropriate poolwide depth bracket oil allowable. Applicant further seeks approval of an unorthodox oil well location in this newly created Ellenburger oil pool for its North Bell Federal Well No. 2 (API No. 30-025-32672), located 1100 feet from the South line and 1500 feet from the West line (Unit N) of said Section 5, all of said Section 5 to be dedicated to said well thereby forming a 640.28- acre oil spacing and proration unit.

### **OPPOSITION OR OTHER PARTY**

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

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# **PROPOSED EVIDENCE**

## **APPLICANT**

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Jeff Niemeyer, Landman	5 Min.	Approximately 2
Jim McCarthy, Geologist	10 Min.	Approximately 4
Bob West, Engineer	10 Min.	Approximately 4

### **OPPOSITION**

WITNESSES (Name and expertise)

EST. TIME

**EXHIBITS** 

### **PROCEDURAL MATTERS**

(Please identify any procedural matters which need to be resolved prior to hearing)

william Signature