

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

IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
COMMISSION FOR THE PURPOSE OF  
CONSIDERING THE AMENDMENT OF  
RULE 303

CASE NO. 11,353

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Pogo  
Producing Company as required by the Oil Conservation  
Commission.

APPEARANCE OF PARTIES

Applicant:

Oil Conservation Division

Attorney:

Rand Carroll

Other Party:

Pogo Producing Company  
Post Office Box 10340  
Midland, Texas 79701

Attn: Terry Gant  
(915) 682-6822

Attorney:

James Bruce  
Hinkle, Cox, Eaton, Coffield  
& Hensley, P.L.L.C., Ltd., Co.  
Post Office Box 2068  
Santa Fe, New Mexico 87504-2068  
(505) 982-4554

STATEMENT OF CASE

Applicant:

RECEIVED

JUL 28 1995

Oil Conservation Division

**Other Party:**

Pogo Producing Company proposes that Rule 303 be amended as follows:

1. Delete current Rule C(1)(a)(i) and replace it with the following language:

The total combined daily oil production from oil zones before commingling (as determined in accordance with Section D, paragraphs (4) and (5) below) does not exceed the depth bracket allowable for the uppermost zone, as fixed by Division Rule 505.

2. Add the following language to Rule C(1)(a)(iii):

The well operator shall provide to the Division proof that the operator has or will acquire sufficient lifting capacity to lift total produced fluids.

3. Amend Rule 303(D)(4) to read:

The latest productivity test (minimum 24 hour test) on Division Form C-116 showing the amount of oil, gas, and water produced from each zone. (Underlined language is new.)

These changes are proposed to allow administrative approval of commingling earlier in the life of a well, allowing more economical production of two or more reservoirs even though one zone may be producing at relatively high rates. This will accelerate recovery and lower operating costs, and in many instances increase the amount of recovered hydrocarbons.

**PROPOSED EVIDENCE**

**Applicant:**

**WITNESSES**

**ESTIMATED TIME**

**EXHIBITS**

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Other Party:

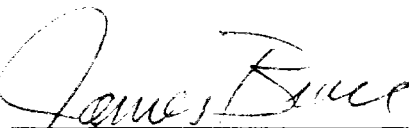
WITNESSES	ESTIMATED TIME	EXHIBITS
Terry Gant (Landman)	5 min.	Rule Proposals
Vance Usher (Engineer)	10 min.	Production Data
Barrett Smith (Operations Engineer)	10 min.	

PROCEDURAL MATTERS

- None -

HINKLE, COX, EATON, COFFIELD  
& HENSLEY, P.L.L.C., Ltd. Co.

By:



James Bruce  
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Attorneys for Pogo Producing Company

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Certificate of Service

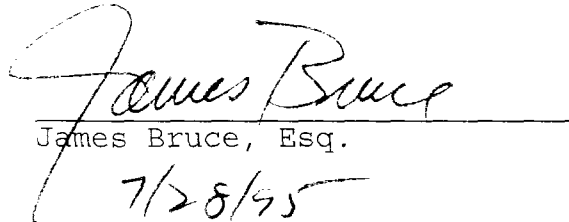
I hereby certify that I caused a true copy of this Pre-Hearing Statement to be sent by first class mail to:

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7/28/95