

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:

CASE NO. 11,402

APPLICATION OF POGO PRODUCING COMPANY FOR TWO UNORTHODOX OIL WELL LOCATIONS, EDDY COUNTY, NEW MEXICO

## PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Applicant

as required by the Oil Conservation Commission.

### APPEARANCE OF PARTIES

# Applicant:

#### Attorney:

Pogo Producing Company	James Bruce	
Post Office Box 10340	Hinkle, Cox, Eaton, Coffield	
Midland, Texas 79701	& Hensley, P.L.L.C., Ltd., Co. Post Office Box 2068	
Attn: Terry Gant	Santa Fe, New Mexico 87504-2068	

Δ (915) 682-6822

## Other Party:

Attorney:

(505) 982-4554

## STATEMENT OF CASE

#### Applicant:

Applicant requests two unorthodox oil well locations in Section 28, Township 24 South, Range 29 East, for the following wells:

(1) The Cedar Canyon 28 Fed. Well No. 1, at an unorthodox oil well location 230 feet from the North line and 2510 feet from the West line (Unit C) of Section 28, with the NE¼NW¼ of Section 28 dedicated to the well; and (2) the Cedar Canyon 28 Fed. Well No. 2, at an unorthodox oil well location 2410 feet from the North line and 2310 feet from the East line (Unit C) of Section 28, with the SW¼NE¼ of Section 28 dedicated to the well. Each well will test the Bone Spring formation (First Bone Spring) and the Delaware formation (Undesignated Cedar Canyon-Delaware Pool).

The locations are based on topography. The wells are on a lease which will expire on December 31, 1995 unless actual production is established by that date. Thus, Pogo has set these matters for hearing to ensure timely approval in the event there is an objection to the locations.

Other Party:

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## PROPOSED EVIDENCE

# Applicant:

WITNESSES	ESTIMATED TIME		EXHIBITS
Scott McDaniel	15 minutes	(a) (b) (c) (d)	Land plat Topographic map APD Notice letters
Other Party:			
WITNESSES	ESTIMATED	TIME	EXHIBITS

PROCEDURAL MATTERS

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

By:

James Bruce Post Office Box 2068 Santa Fe, New Mexico 87504-2068 (505) 982-4554

Attorneys for Pogo Producing Company