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:

APPLICATION OF CITATION OIL & GAS CORP. FOR TWO UNORTHODOX GAS WELL LOCATIONS AND FOR SIMULTANEOUS DEDICATION LEA COUNTY, NEW MEXICO.

CASE NO. 11638

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by CITATION OIL & GAS CORP., as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

ATTORNEY

Citation Oil & Gas Corp. 8223 Willow Place South Suite 250 Houston, Texas 77070 attn: Gary Johnson (281) 469-9664 W. Thomas Kellahin KELLAHIN & KELLAHIN P.O. Box 2265 Santa Fe, NM 87504 (505) 982-4285

STATEMENT OF CASE

On behalf of Citation Oil & Gas Corp., we respectfully request your approval of its application for a Unorthodox Eumont Gas Well Locations and for Simultaneous Dedication as follows:

- (1) Division Order NSP-488, dated May 11, 1959 approved a 320-acre non-standard Eumont gas proration unit ("NSP") dedicated to the Devonian State Com Well No. 1 (API 30-025-03457) located 1980 feet from the East line and 1980 feet from the North line of Section 20, T21S, R36E, NMPM;
- (2) As a result of an increasing gas-oil ratio which exceeded and continues to exceed 100,000 cubic feet of gas per barrel of oil, the Devonian State Well No. 3 (API 30-025-04730) located 660 feet from the North and East lines (Unit A) of Section 20, T21S, R36E, should have been reclassified from an oil well to a gas well in this pool as of December 1, 1990. We now seek to correct that error and ask that you approve:
 - (a) the dedication of this well to the existing 320-acre NSP; and
 - (b) the approval of an unorthodox well location for this well because the well is 660 feet from an outer boundary rather than 990 feet.
- (3) In addition, as a result of an increasing gas-oil ratio which exceeded and continues to exceed 100,000 cubic feet of gas per barrel of oil, the Devonian State Well No. 2 (API 30-025-04729) located 660 feet from the North line and 1980 East line (Unit B) of Section 20, T21S, R36E, also should have been reclassified from an oil well to a gas well in this pool as of October 1, 1990. We now seek to correct that error and ask that you approve:
 - (a) the dedication of this well to the existing 320-acre NSP; and
 - (b) the approval of an unorthodox well location for this because the well is 660 feet from an outer boundary rather than 990 feet.

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PROPOSED EVIDENCE

APPLICANT:

WITNESSES EST. TIME EXHIBITS

Gary Johnson (Vice President) 20 min. @ 6 exhibits

Steve Robinson

(Drilling & Production Manager) 20 Min. @ 8 exhibits

PROCEDURAL MATTERS

None anticipated at this time.

KELLAHIN AND KELLAHIN

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