

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 KERR-MCGEE OIL & GAS  
ONSHORE LLC TO EXTEND THE TIME DURING  
WHICH IT MAY MAKE UP UNDERPRODUCTION  
IN A GAS PRORATION UNIT IN THE INDIAN  
BASIN-UPPER PENNSYLVANIAN GAS POOL,  
EDDY COUNTY, NEW MEXICO.

Case No. 12537

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Kerr-McGee Oil & Gas  
Onshore LLC  
14311 Welch Road  
Dallas, Texas 75244  
Attention: Steve Foerster  
(972) 715-4608

APPLICANT'S ATTORNEY

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

OPPONENT

STATEMENT OF THE CASE

APPLICANT

Applicant is underproduced in its Conoco State well unit, comprising all of Section 2, Township 22 South, Range 23 East, NMPM. Due to lack of gas plant capacity, applicant will not be able to make up the underproduction during the time allowed by the rules for prorated gas pools. Therefore, applicant requests an extension of time during which to make up the underproduction.

OPPONENT

**PROPOSED EVIDENCE**APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Steve Foerster (landman)	5 min.	Two
_____ (geologist)	10 min.	Two
Joe Martin (engineer)	20 min.	Six

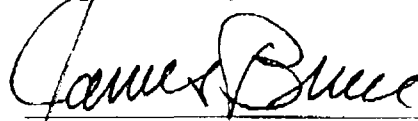
OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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**PROCEDURAL MATTERS**

-None-

Respectfully submitted,



James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
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Attorney for Kerr-McGee Oil & Gas  
Onshore LLC