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W. THOMAS KELLAHIN*

*NEW MEXICO BOARD OF LEGAL SPECIALIZATION
RECOGNIZED SPECIALIST IN THE AREA OF
NATURAL RESOURCES-OIL AND GAS LAW

JASON KELLAHIN (RETIRED 1991)

February 19, 2001

HAND DELIVERED

Ms. Lori Wrotenbery, Chair
Oil Conservation Commission
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

Re: REQUEST FOR HEARING DENOVO

Order No. R-11652

NMOCD Case 12587

*Application of Sapient Energy Corp.
for an unorthodox well location and non-
standard proration unit or in the alternative
a 160-acre non-standard proration unit
Lea County, New Mexico*

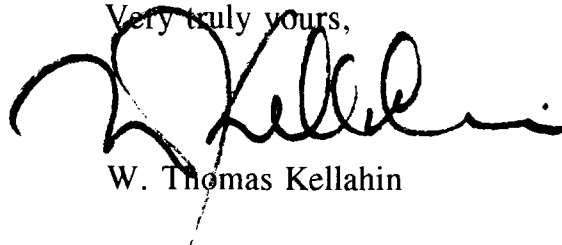
NMOCD Case 12605

*Application of Sapient Energy Corp.
for special pool rules,
Lea County, New Mexico*

Dear Ms. Wrotenbery:

On behalf of Sapient Energy Corp., please find enclosed our request for a Hearing DeNovo of the referenced cases before the New Mexico Oil Conservation Commission. We request that this matter be set for hearing on the November 9th docket.

Very truly yours,



W. Thomas Kellahin

cc: William F. Carr, Esq.
Attorney for Conoco Inc.
cc: Sapient Energy Corp.
Attn: Chuck Perrin

61 SEP 19 PM 1:40

**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. 12587

**APPLICATION OF SAPIENT ENERGY CORP. FOR AN
UNORTHODOX GAS WELL LOCATIONS AND (i) TWO
NON-STANDARD 160-ACRE GAS SPACING UNITS;
OR IN THE ALTERNATIVE (ii) ONE NON-STANDARD
160-ACRE GAS SPACING AND PRORATION UNIT,
LEA COUNTY, NEW MEXICO.**

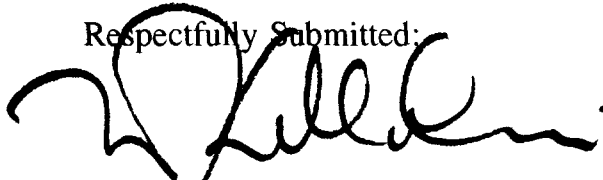
CASE NO. 12605

**APPLICATION OF SAPIENT ENERGY CORPORATION
FOR SPECIAL POOL RULES,
LEA COUNTY, NEW MEXICO**

**SAPIENT ENERGY CORP.'S
REQUEST FOR A DE NOVO HEARING
BEFORE THE
NEW MEXICO OIL CONSERVATION COMMISSION**

Comes now SAPIENT ENERGY CORP., a party of record before the New Mexico Oil Conservation Division in Cases 12587 and 12605 and adversely affected by Division Order R-11652 entered September 13, 2001, by its attorneys Kellahin & Kellahin and pursuant to NMSA (1978) Section 70-2-13, hereby requests that the New Mexico Oil Conservation Commission hold a HEARING DENOVO in these matters.

Respectfully Submitted:



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Attorneys for Sapient Energy Corp.