

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. 10,412

APPLICATION OF MW PETROLEUM
CORPORATION/APACHE CORPORATION
TO AMEND DIVISION ORDER R-9487-A,
EDDY COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Musselman,
Owen & King Operating, Inc. as required by the Oil
Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

MW Petroleum Corporation/
Apache Corporation

William F. Carr

OPPOSITION OR OTHER PARTY

ATTORNEY

(1) Musselman, Owen & King
Operating, Inc.
507 N. Marienfeld
Midland, TX 79701
Attention: Mike Hedrick
(915) 683-9314

James Bruce
Hinkle, Cox, Eaton,
Coffield & Hensley
500 Marquette, N.W.
Suite 800
Albuquerque, N.M. 87102
(505) 768-1500

(2) Meridian Oil Inc.

W. Thomas Kellahin

STATEMENT OF CASE

APPLICANT

OPPOSITION OR OTHER PARTY

Amoco Production Company applied for the unorthodox location for the well subject to Orders R-9487 and R-9487-A, now operated by Apache, and requested an allowable of 48%, which was granted by the Division. Musselman, Owen & King Operating, Inc. did not oppose the case due to its agreement with Amoco (now Apache) on the penalty. There is insufficient reason to increase the allowable, and increasing the allowable will impair the correlative rights of offset owners.

PROPOSED EVIDENCE

APPLICANT

WITNESS

EST. TIME

EXHIBITS

OPPOSITION

WITNESS

EST. TIME

EXHIBITS

(Engineer)

25 minutes

- (a) Cross-section
- (b) Penalty calculations

PROCEDURAL MATTERS

Respectfully Submitted,

HINKLE, COX, EATON, COFFIELD &
HENSLEY

Bý


James Bruce
500 Marquette, N.W.
Suite 800
Albuquerque, N.M. 87102
(505) 768-1500

Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was mailed this 26th day of November, 1991 to William F. Carr, P. O. Box 2208 Santa Fe, New Mexico 87504 and W. Thomas Kellahin, P. O. Box 2265, Santa Fe, New Mexico 87504.

By



James Bruce

**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. 10412

IN THE MATTER OF THE APPLICATION
OF MW PETROLEUM CORPORATION/
APACHE CORPORATION TO AMEND
DIVISION ORDER NO. R-9487-A,
EDDY COUNTY, NEW MEXICO.

RECEIVED

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OIL CONSERVATION DIV.
SANTA FE

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by William F. Carr, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

MW Petroleum Corporation/Apache Corp.
c/o Ceci Leonard _____
1500 City West Blvd., Suite 400
Houston, Texas 77042 _____
(713) 953-5306 _____

ATTORNEY

William F. Carr _____
Campbell, Carr, Berge & Sheridan, P.A.
Post Office Box 2208 _____
Santa Fe, New Mexico 87504 _____
(505) 988-4421 _____

OPPOSITION OR OTHER PARTY

Telephone: _____

name, address, phone and
contact person

ATTORNEY

Telephone: _____

STATEMENT OF CASE

APPLICANT

MW Petroleum Corporation/Apache Corporation, applicant, seeks to amend Division Order No. R-9487-A, which authorized the drilling of a well at an unorthodox gas well location 2049 feet from the North line and 480 feet from the West line (Unit E) of Section 12, Township 22 South, Range 23 East, N.M.P.M., Indian Basin-Upper Pennsylvanian Gas Pool. Applicant specifically seeks to amend the gas allowable acreage factor assigned to the well by said order. All of Section 12 is dedicated to the subject well forming a standard 640-acre gas spacing and proration unit for said pool.

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

PROPOSED EVIDENCE

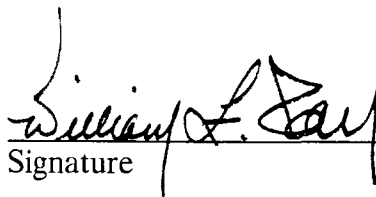
APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Ceci Leonard, Petroleum Engineer	15 Min.	Approximately 3
John Polasek, Geologist	15 Min.	Approximately 3

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS


Signature