

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

**APPLICATIONS OF HILCORP ENERGY COMPANY FOR
AN EXCEPTION TO THE WELL DENSITY
REQUIREMENTS OF THE SPECIAL RULES AND
REGULATIONS FOR THE BASIN-DAKOTA GAS POOL,
RIO ARRIBA COUNTY, NEW MEXICO.**

CASE NOS. 25741-25745

HILCORP'S CONSOLIDATED PREHEARING STATEMENT

Hilcorp Energy Company, ("Hilcorp") (OGRID No. 372171), through its undersigned counsel, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Hilcorp Energy Company

ATTORNEYS

Adam G. Rankin
Paula M. Vance
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile

STATEMENT OF THE CASE

The well density requirements in the Special Rules and Regulations of the Basin-Dakota Gas Pool currently state as follows:

II. ACREAGE AND WELL LOCATION REQUIREMENTS

A. Standard GPU (Gas Proration Unit): *A standard GPU in the Basin-Dakota Pool shall be 320 acres, more or less, comprising any two contiguous quarter sections of a single section that is a legal subdivision of the U. S. Public Land Surveys.*

B. Well density:

(1) Up to four (4) wells may be drilled on a GPU, as follows:

- (a) *the FIRST OPTIONAL INFILL WELL drilled on a GPU shall be located in the quarter section not containing the INITIAL Dakota well;*
- (b) *the SECOND OPTIONAL INFILL WELL drilled on a GPU shall be located in a quarter-quarter section not containing a Dakota well and within a quarter section of the GPU not containing more than one (1) Dakota well;*
- (c) *the THIRD OPTIONAL INFILL WELL drilled on a GPU shall be located in a quarter-quarter section of the GPU not containing a Dakota well and within a quarter section of the GPU not containing more than one (1) Dakota well;*
- (d) *at the discretion of the operator, the second or third optional infill well may be drilled prior to the drilling of the first optional infill well;*
- (e) *no more than two wells shall be located within either quarter section in a GPU; and*
- (f) *any deviation from the above-described well density requirements shall be authorized only after hearing.*

In these consolidated cases, Hilcorp seeks approval under Rule II.B for the Division to enter an order granting an exception to the well density requirements as follows:

- In **Case No. 25741**, Hilcorp requests that the Division enter an order granting an exception to authorize Hilcorp to simultaneously dedicate and produce the **San Juan 27-5 Unit 001N Well** (API No. 30-039-PENDING) within Lots 1-2, S/2 NE/4 and SE/4 (E/2 equivalent) of irregular Section 4, Township 27 North, Range 5 West, permitting three wells to produce within the NE/4 of the spacing unit;
- In **Case No. 25742**, Hilcorp requests that the Division enter an order granting an exception to authorize Hilcorp to simultaneously dedicate and produce the **San Juan 27-5 Unit 090P Well** (API No. 30-039-PENDING) within the E/2 of Section 16, Township 27 North, Range 5 West, permitting three wells to produce within the NE/4 of the spacing unit;
- In **Case No. 25743**, Hilcorp requests that the Division enter an order granting an exception to authorize Hilcorp to simultaneously dedicate and produce the **San Juan 28-7 Unit 075 ST1 Well** (API No. 30-039-07412-01) within the W/2 of Section 15, Township 28 North, Range 7 West, permitting three wells to produce

within the SW/4 of the spacing unit, and produce five wells within the standard 320-acre, more or less, spacing and proration unit; and

- In **Case No. 25744**, Hilcorp requests that the Division enter an order granting an exception to authorize Hilcorp to simultaneously dedicate and produce the **San Juan 28-7 Unit 190P Well** (API No. 30-039-PENDING) within the E/2 of Section 27, Township 28 North, Range 7 West, permitting four wells to produce within the NE/4 of the spacing unit, and produce five wells within the standard 320-acre, more or less, spacing and proration unit; and
- In **Case No. 25745**, Hilcorp requests that the Division enter an order granting an exception to authorize Hilcorp to simultaneously dedicate and produce the **San Juan 29-7 Unit 058P Well** (API No. 30-039-PENDING) within the W/2 of Section 26, Township 29 North, Range 7 West, permitting three wells to produce within the NW/4 of the spacing unit.

Approval of these applications will not impair the correlative rights of any other interest owner in the Basin-Dakota Gas Pool and will afford Hilcorp the opportunity to produce incremental reserves from these spacing units, avoiding waste. Approval will also be in the best interest of conservation, the prevention of waste, and the protection of correlative rights.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Gatewood Brown, Landman	Self-Affirmed Statement	Approx. 2
Marcus Hill, Reservoir Engineer	Self-Affirmed Statement	Approx. 4

PROCEDURAL MATTERS

Hilcorp requests that these matters be consolidated for hearing and intends to present these cases by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP



Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
agrarkin@hollandhart.com
pmvance@hollandhart.com

ATTORNEYS FOR HILCORP ENERGY COMPANY

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 530049

QUESTIONS

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 530049
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	Not answered.
Testimony time (in minutes)	Not answered.