

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

**AMENDED APPLICATION OF HILCORP
ENERGY COMPANY FOR AN EXCEPTION
TO THE WELL DENSITY REQUIREMENTS
OF THE SPECIAL RULES AND
REGULATIONS FOR THE BLANCO-
MESAVERDE GAS POOL, SAN JUAN AND
RIO ARRIBA COUNTIES, NEW MEXICO.**

CASE NO. 15978

**APPLICATION OF HILCORP ENERGY
COMPANY FOR AN EXCEPTION TO THE
WELL DENSITY REQUIREMENTS OF THE
SPECIAL RULES AND REGULATIONS FOR
THE BLANCO-MESAVERDE GAS POOL,
SAN JUAN AND RIO ARRIBA COUNTIES,
NEW MEXICO.**

CASE NO. 16004

HILCORP'S CONSOLIDATED PREHEARING STATEMENT

Hilcorp Energy Company, ("Hilcorp") (OGRID No. 372171), through its undersigned counsel, hereby submits this Consolidated Pre-Hearing Statement for the above referenced matters scheduled for hearing before the Division Examiners on March 8, 2018.

APPEARANCES

APPLICANT

Hilcorp Energy Company
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Houston, Texas 77002

ATTORNEYS

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STATEMENT OF THE CASE

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

I. ACREAGE AND WELL LOCATION REQUIREMENTS

A. Standard GPU (Gas Proration Unit): A standard GPU in the Blanco-Mesaverde 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 standard GPU, as follows:

(a) the FIRST OPTIONAL INFILL WELL drilled on a GPU shall be located in the quarter section not containing the INITIAL Mesaverde well;

(b) the SECOND OPTIONAL INFILL WELL drilled on a GPU shall be located in a quarter-quarter section not containing a Mesaverde well and within a quarter section not containing more than one (1) Mesaverde well;

(c) the THIRD OPTIONAL INFILL WELL drilled on a GPU shall be located in a quarter-quarter section not containing a Mesaverde well and within a quarter section not containing more than one (1) Mesaverde 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 I(B)(1)(f) for the following:

- In Case No. 15978 the company seeks authority to complete and simultaneously produce the **San Juan 28-7 Unit 233G Well** (API No. 30-039-27005) in Unit H, and the **San Juan 28-7 Unit 233E Well** (API No. 30-039-2291) in Unit G, both within the E/2 of Section 14, Township 28 North, Range 7 West, permitting the total number of wells within the spacing unit to five, the number of wells in a quarter section to three, and two wells in the SE/4 NE/4 (Unit H).
- In Case No. 16004 the company seeks authority to complete and simultaneously produce the **San Juan 28-6 Unit 164 Well** (API No. 30-039-20479) in Unit M, within the W/2 of Section 34, Township 28 North, Range 6 West, permitting the total number of wells dedicated and producing within this spacing and proration unit to five, and the number of wells within a quarter section to three.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Chuck Creekmore – Petroleum Landman	Approx. 15	Approx. 3 for each consolidated case
James Osborn – Reservoir Engineer	Approx. 20	Approx. 5 for each consolidated case

PROCEDURAL MATTERS

Hilcorp has requested and obtained similar relief in a prior set of consolidated cases heard by the Division on January 11, 2018, and resulting in Division Orders R-14553 through R-14563 (issued on January 24, 2018). For purposes of administrative efficiency, Hilcorp requests that (a) these matters likewise be consolidated for purposes of presenting evidence, and (b) the

Examiners take administrative notice of the testimony and Division findings in the prior cases resulting in Division Orders R-14553 through R-14563.

Respectfully submitted,

HOLLAND & HART LLP

A handwritten signature in black ink, appearing to read 'MFeldewert', is written over a horizontal line.

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