

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

APPLICATION OF THE OIL CONSERVATION DIVISION TO AMEND DIVISION
ORDER R-13382-E.

CASE NUMBERS 14613 & 14647

Pre-Hearing Statement

Applicant:

Oil Conservation Division
c/o: Gabrielle A. Gerholt
1220 South Saint Francis
Santa Fe, NM 87505
Gabrielle.Gerholt@state.nm.us
Phone: 505-476-3451
Fax: 505-476-3462

Interested Parties:

COG Operating, LLC
c/o: Adam Rankin
Holland & Hart
110 N Guadalupe St #1
Santa Fe, NM 87504
agrarkin@hollandhart.com

Burnett Oil Co., Inc.
and Hudson Oil Company of Texas
c/o: Bob Grable
Kelly Hart & Hallman LLP
201 Main Street, Suite 2500
Fort Worth, TX 76102
bob.grable@kellyhart.com
and
c/o: Michael Campbell
Campbell Trial Law LLC
110 N. Guadalupe, Suite 6
Santa Fe, NM 87504
mcampbell@campbelltriallaw.com

RECEIVED OOD
2017 APR 19 P 2:51

Apache Corporation
c/o: Earl DeBrine and John R. Cooney
Modrall Sperling Roehl Harris & Sisk PA
500 4th Street NW #1000
Albuquerque, NM 87103
jrc@modrall.com
edebrine@modrall.com
andy.taylor@apachecorp.com

Premier Oil
Ken.jones@premieroilgas.com

Statement of the Case:

The Oil Conservation Division (Division) seeks to re-open Cases 14613 and 14647 for the express limited purpose of amending Order R-13382-E (“Order”) to relieve the administrative burdens upon the Oil Conservation Division, the New Mexico State Land Office, and the New Mexico Taxation and Revenue Department arising from the creation of the Mar-LoCo-Glorieta-Yeso Pool. The Division seeks to abolish the Mar-LoCo-Glorieta-Yeso Pool and in its place re-designate the five separate pools that were consolidated by the Order: the (1) Cedar Lake-Glorieta-Yeso Pool, (2) Fren-Glorieta-Yeso Pool, (3) East Fren-Glorieta-Yeso Pool, (4) LoCo Hills-Glorieta-Yeso Pool and (5) North Maljamar-Paddock Pool. The Applicant does not seek to amend the Special Pool Rules for the five Glorieta-Yeso Pools which comprised the newly formed Mar-LoCo-Glorieta-Yeso Pool; those rules will remain in place and apply to the five Glorieta-Yeso pools.

Witness:

1. Ed Martin, Oil and Gas Inspector, District IV Supervisor

Qualifications and Experience:

Bachelor of Science in Economics from University of New Mexico, 1980.
Oilfield experience with a geophysical service company in Houston from 1981 to 1993.
New Mexico Oil Conservation Division (18 years):
 ONGARD project manager - 8 years
 Environmental Bureau - 4 years
 District IV Supervisor - 6 years

Concise Statement of Testimony:

If testimony is needed, Mr. Martin will attest to the difficulties in administering the Mar-LoCo-Glorieta-Yeso Pool for the respective agencies.

Approximate time of testimony: Mr. Martin’s testimony will take 15 minutes.

Respectfully Submitted,



Gabrielle A. Gerholt
Assistant General Counsel
Energy, Minerals and Natural
Resources Department
1220 S. St. Francis Drive
Santa Fe, NM 87505
(505)-476-3451

CERTIFICATE OF SERVICE

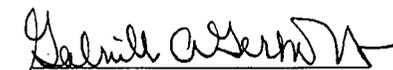
I hereby certify that on April 19, 2012 I electronically served this pleading on the following parties:

COG Operating, LLC
c/o: Adam Rankin
Holland & Hart
110 N Guadalupe St #1
Santa Fe, NM 87504
agrarkin@hollandhart.com

Premier Oil
ken.jones@premieroilgas.com

Burnett Oil Co., Inc.
and Hudson Oil Company of Texas
c/o: Bob Grable
Kelly Hart & Hallman LLP
201 Main Street, Suite 2500
Fort Worth, TX 76102
bob.grable@kellyhart.com
and
c/o: Michael Campbell
Campbell Trial Law LLC
110 N. Guadalupe, Suite 6
Santa Fe, NM 87504
mcampbell@campbelltriallaw.com

Apache Corporation
c/o: Earl DeBrine and John R. Cooney
Modrall Sperling Roehl Harris & Sisk PA
500 4th Street NW #1000
Albuquerque, NM 87103
jrc@modrall.com
edebrine@modrall.com
andy.taylor@apachecorp.com



Gabrielle A. Gerholt