

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

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**IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION FOR  
THE PURPOSE OF CONSIDERING:**

**APPLICATION OF ANSCHUTZ OIL COMPANY,  
LLC FOR COMPULSORY POOLING AND  
AN UNORTHODOX OIL WELL LOCATION,  
RIO ARRIBA COUNTY, NEW MEXICO.**

**Case No. 15,234**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Anschutz Oil Company, LLC  
Suite 2400  
555 17th Street  
Denver, Colorado 80202

Attention: Deidre O'Callaghan  
(303) 299-1478

**APPLICANT'S ATTORNEY**

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

**OPPONENT**

**OPPONENT'S ATTORNEY**

**STATEMENT OF THE CASE**

**APPLICANT**

Anschutz Oil Company, LLC seeks an order pooling of all mineral interests in the Mancos formation underlying the W/2 of Section 14 and all of Section 15 in a non-standard 960 acre spacing and proration unit for any formations and/or pools developed on 640 acre spacing within that vertical extent, including the Gavilan-Mancos Pool. Applicant proposes to drill its Regina Com. 25-2-14-15 Well No. 1H, to a depth sufficient to test the Gavilan-Mancos Pool, and seeks to dedicate the W/2 of Section 14 and all of Section 15 to the well to form a non-standard 960 acre spacing and proration unit for any formations and/or pools developed on 640 acre spacing within that vertical extent. The well is a horizontal well, to be drilled from a surface location in

the NW/4NE/4 of Section 14, with a terminus in the NW/4NW/4 of Section 15. The beginning of the producing interval will be approximately 830 feet from the north line and 2310 feet from the west line of Section 14, to a terminus 830 feet from the north line and 330 feet from the west line of Section 15, which is unorthodox under the special rules and regulations for the Gavilan-Mancos Pool. **The non-standard unit was previously approved by the Division.**

Applicant seeks three things in this case: (1) pooling all non-consenting working interest owners into the well unit; (2) pooling royalty interest owners into the well unit whose leases do not allow pooling of non-standard well units; and 93) approval of an unorthodox oil well location.

OPPONENT

**PROPOSED EVIDENCE**

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Deidre O'Callaghan (landman)	15 min.	Approx. 6
John Michel Richardson (landman)	10 min.	Approx. 4
Monica Stoeber (geologist)	15 min.	Approx. 2

PURSUANT TO THE DIVISION'S RECENT NOTICE, APPLICANT INTENDS TO PRESENT THIS CASE BY AFFIDAVIT.

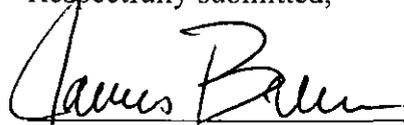
OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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**PROCEDURAL MATTERS**

-None-

Respectfully submitted,

A handwritten signature in cursive script that reads "James Bruce". The signature is written in black ink and is positioned above a horizontal line.

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Anschutz Oil Company, LLC