

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

**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,
RIO ARRIBA COUNTY, NEW MEXICO.**

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CASE NO. 15939

HILCORP'S PREHEARING STATEMENT

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

APPEARANCES

APPLICANT

Hilcorp Energy Company
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Houston, Texas 77002

ATTORNEYS

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STATEMENT OF THE CASE

Hilcorp seeks an exception to the well density requirements of Rule I.B of the Special Rules and Regulations of the Blanco-Mesaverde Gas Pool to permit it to complete and simultaneously produce three wells in the same quarter section within the same standard 320-acre spacing and proration unit.

Hilcorp is the operator of a standard 320-acre, more or less, spacing and proration unit in the Blanco-Mesaverde Gas Pool comprised of the E/2 of Section 11, Township 27 North, Range 6 West, Rio Arriba County, New Mexico, in which the following four wells are currently completed and producing:

- a. San Juan 28-6 Unit 158 Well (API No. 30-039-20390), Sec. 11, T27N, R6W (Unit G);
- b. San Juan 28-6 Unit 208M Well (API No. 30-039-25704), Sec. 11, T27N, R6W, (Unit O); and
- c. San Juan 28-6 Unit 208N Well (API: 30-039-30586), Sec. 11, T27N, R6W (Unit A).

Hilcorp now proposes to simultaneously dedicate and produce the following well within the same standard spacing and proration unit, at the following location: **San Juan 28-6 Unit 158E Well** (API No. 30-039-30020), Sec. 11, T27N, R6W (Unit H).

Hilcorp therefore requests that the Division enter an order granting an exception to the well density requirements of Rule 1.B of the Special Rules and Regulations of the Blanco-Mesaverde Pool to authorize Hilcorp to simultaneously dedicate and produce the San Juan 28-6 Unit 158E Well within the E/2 of Section 11, Township 27 North, Range 6 West, permitting the number of completed and producing wells within a quarter section to be three.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Chuck Creekmore – Landman	Approx. 10	Approx. 5
Eddie Pippin – Geologist	Approx. 20	Approx. 5
Michelle Sivadon – Reservoir Engineer	Approx. 20	Approx. 5
Brad Pearson – Landman	Approx. 20	Approx. 12
Wyn McCubbin – Landman	Approx. 20	Approx. 12

PROCEDURAL MATTERS

Hilcorp has filed numerous similar applications for exceptions to the density provisions of the Special Rules and Regulations of the Blanco-Mesaverde Pool. For administrative efficiency and ease of presentation, Hilcorp respectfully requests that the following cases be consolidated for purposes of presenting evidence and testimony:

- 15934, 15936, 15937, 15938, 15939, 15940, 15941, 15942, 15943, 15944, 15945.

Hilcorp has filed amended applications for Case Nos. 15932, 15933 and 15935, so those cases will be necessarily continued until the January 25, 2017 docket.

Respectfully submitted,

HOLLAND & HART LLP



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