

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

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

**APPLICATIONS OF EL PASO E&P COMPANY, L.P.
FOR AN EXCEPTION TO NMAC 19.15.3.104.C(3) TO
ALLOW INFILL DRILLING AND SIMULTANEOUS
DEDICATION IN SEVEN WELL UNITS, COLFAX
COUNTY, NEW MEXICO.**

Case Nos. 13,900-13,906

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

El Paso E&P Company, L.P.
Suite 1900
1099 18th Street
Denver, Colorado 80202

APPLICANT'S ATTORNEY

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

Attention: Laura B. Smith

OPPONENT

Howard Musgrave - Senior Staff Res. Engr.

OPPONENT'S ATTORNEY

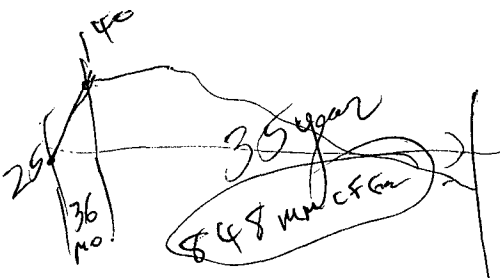
(GEOLOG-ENGR)
38 years

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order approving simultaneous dedication for the following wells and well units:

- (a) Case No. 13,900: The VPR B Well No. 300 as an infill well in an existing 160 acre gas spacing unit in the Vermejo and Raton formations comprising the SW/4 of Section 30, Township 30 North, Range 19 East, N.M.P.M. Applicant further seeks to simultaneously dedicate production from the Vermejo and Raton formations in the SW/4



675 prod wells
(161 com wells this year)

of Section 30 to the VPR B Well No. 300, to be located in Unit N of Section 30, and to the existing VPR B Well No. 22, located in Unit L of Section 30;

(b) Case No. 13,901: The VPR B Well No. 301 as an infill well in an existing 160 acre gas spacing unit in the Vermejo and Raton formations comprising the SE/4 of Section 25, Township 30 North, Range 18 East, N.M.P.M. Applicant further seeks to simultaneously dedicate production from the Vermejo and Raton formations in the SE/4 of Section 25 to the VPR B Well No. 301, to be located in Unit P of Section 25, and to the existing VPR B Well No. 21, located in Unit I of Section 25;

(c) Case No. 13,902: The VPR E Well No. 64 as an infill well in an existing 160 acre gas spacing unit in the Vermejo and Raton formations comprising the NW/4 of Section 3, Township 31 North, Range 19 East, N.M.P.M. Applicant further seeks to simultaneously dedicate production from the Vermejo and Raton formations in the NW/4 of Section 3 to the VPR E Well No. 64, to be located in Unit C of Section 3, and to the existing VPR A Well No. 64, located in Unit E of Section 3;

(d) Case No. 13,903: The VPR E Well No. 63 as an infill well in an existing 160 acre gas spacing unit in the Vermejo and Raton formations comprising the NE/4 of Section 4, Township 31 North, Range 19 East, N.M.P.M. Applicant further seeks to simultaneously dedicate production from the Vermejo and Raton formations in the NE/4 of Section 4 to the VPR E Well No. 63, to be located in Unit A of Section 4, and to the existing VPR E Well No. 13, located in Unit G of Section 4;

(e) Case No. 13,904: The VPR A Well No. 504 as an infill well in an existing 160 acre gas spacing unit in the Vermejo and Raton formations comprising the NE/4 of Section 10, Township 31 North, Range 19 East, N.M.P.M. Applicant further seeks to simultaneously dedicate production from the Vermejo and Raton formations in the NE/4 of Section 10 to the VPR A Well No. 504, to be located in Unit H of Section 10, and to the existing VPR A Well No. 77, located in Unit G of Section 10;

(f) Case No. 13,905: The VPR A Well No. 501 as an infill well in an existing 160 acre gas spacing unit in the Vermejo and Raton formations comprising the SE/4 of Section 10, Township 31 North, Range 19 East, N.M.P.M. Applicant further seeks to simultaneously dedicate production from the Vermejo and Raton formations in the SE/4 of Section 10 to the VPR A Well No. 501, to be located in Unit J of Section 10, and to the existing VPR A Well No. 71, located in Unit P of Section 10; and

(g) Case No. 13,906: The VPR A Well No. 503 as an infill well in an existing 160 acre gas spacing unit in the Vermejo and Raton formations comprising the NW/4 of Section 11, Township 31 North, Range 19 East, N.M.P.M. Applicant further seeks to simultaneously dedicate production from the Vermejo and Raton formations in the NW/4 of Section 11 to the VPR A Well No. 503, to be located in Unit C of Section 11, and to the existing VPR A Well No. 78, located in Unit F of Section 11.

Applicant also seeks approval to produce the wells on each well unit concurrently.

OPPONENT**PROPOSED EVIDENCE**APPLICANTWITNESSESEST. TIMEEXHIBITS
(engineer)

30 min.

Approx. 4

(geologist)

15 min.

Approx. 2

OPPONENTWITNESSESEST. TIMEEXHIBITS**PROCEDURAL MATTERS**

Applicant requests that these matters be consolidated for hearing.

Respectfully submitted,



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

Attorney for El Paso E&P Company, L.P.