

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:

377071107

APR 9 1996

APPLICATION OF POGO PRODUCING
COMPANY FOR AN EXCEPTION TO THE
SALT PROTECTION CASING STRING
REQUIREMENTS OF DIVISION ORDER
NO. R-111-P, EDDY COUNTY, NEW MEXICO

Oil Conservation Division

CASE NO. 11611

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT'S ATTORNEY

James Bruce
Hinkle, Cox, Eaton, Coffield
& Hensley, L.L.P.
P.O. Box 2068
Santa Fe, New Mexico 87504
(505) 982-4554

APPLICANT

Pogo Producing Company
P.O. Box 10340
Midland, Texas 79702
(915) 682-6822
Attn: Scott McDaniel

OPPONENT'S ATTORNEY

OPPONENT

STATEMENT OF THE CASE

APPLICANT

Applicant seeks to drill its Amax "24" Fed. Well No. 13 without the salt protection string required by Order No. R-111-P. The well, located in Unit M of §24-T23S-R31E, will be drilled in an area that is unleased for potash, and has been extensively developed for oil and gas. Furthermore, there are other wells in the area which have been drilled without the salt protection string. Drilling the well with the salt protection string will adversely affect the well's economics.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Scott McDaniel (landman)	10 min.	(a) land plat (b) potash map
George Dillman (geologist)	10 min.	(a) structure map (b) cross-section
Mark Burkett (engineer)	10 min.	(a) AFE (b) well economics

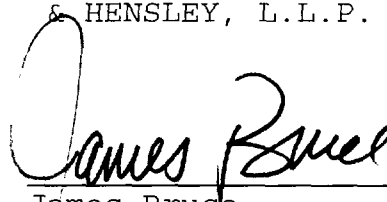
OPPONENT

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

-None-

HINKLE, COX, EATON, COFFIELD
& HENSLEY, L.L.P.



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Attorneys for Pogo Producing
Company