

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

IN THE MATTER OF THE APPLICATION  
OF RAPTOR NATURAL PIPELINE LLC FOR  
SPECIAL PROJECT RULES FOR THE  
GRAMA RIDGE MORROW GAS STORAGE UNIT,  
LEA COUNTY, NEW MEXICO

CASE NO. 12,588

**PRE-HEARING STATEMENT**

This prehearing statement is submitted by Applicant, Raptor Natural Pipeline, LLC as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT  
Raptor Natural Pipeline, LLC  
P.O. Box 2197  
Houston, Texas 77252

ATTORNEY  
J. Scott Hall  
Miller, Stratvert & Torgerson, P.A.  
Post Office Box 1986  
Santa Fe, New Mexico 87504-1986  
(505) 989-9614

OPPOSITION OR OTHER PARTY  
Nearburg Exploration Company, LLC  
Bob Shelton  
3300 No. A Street  
Building 2, Suite 120  
Midland, Texas 79705  
(915) 686-8325

ATTORNEY  
William F. Carr  
Campbell, Carr, Berge & Sheridan  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421

C. W. Trainer  
c/o Oil Reports & Gas Services, Inc.  
1008 West Broadway  
Hobbs, New Mexico 88240  
(505) 393-2017

BTA Oil Producers  
104 South Pecos  
Midland, Texas 79701  
(915) 682-3753

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OIL CONSERVATION DIVISION

**Pre-hearing Statement**  
**NMOCD Case No. 12,588**  
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Yates Petroleum Corporation  
105 South Fourth Street  
Artesia, New Mexico 88210-2177  
(505) 748-1471

Concho Resources, Inc.  
110 W. Louisiana Ave  
Midland, Texas 79701  
(915) 683-7443

**STATEMENT OF CASE**

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

The applicant requests the Division establish rules requiring operators of all newly drilled or recompleted wells in the Morrow formation to provide the operator of the Grama Ridge Morrow Gas Storage Unit with notification prior to drilling along with information and data obtained during the drilling and completion. The special project rules would also establish casing and cementing requirements for wells penetrating the Morrow formation.

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

The basis of the opposition, if any, of Nearburg Exploration Company, *et al.* has not been communicated to Applicant.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
John Schell, fact witness	20 minutes	approx. 4
Karl Loofe, geologist	35 minutes	approx. 8
John Wells, Petroleum Engineer	25 minutes	approx. 6

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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**PROCEDURAL MATTERS**

(Please identify any procedural matters which need to be resolved prior to the hearing)

*T. J. Weyhall*

\_\_\_\_\_  
Signature

**CERTIFICATE OF SERVICE**

I hereby certify that on the 18 day of May, 2001, a copy of the foregoing pleading was forwarded to:

William F. Carr  
Campbell, Carr, Berge & Sheridan, P.A.  
Post Office Box 2208  
Santa Fe, New Mexico 87504

*J. Scott Hall*

\_\_\_\_\_  
J. Scott Hall

DOCKET: SPECIAL EXAMINER HEARING – MONDAY – MAY 21, 2001

8:15 A.M. - OCD Hearing Room  
1220 South St. Francis  
Santa Fe, New Mexico

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**CASE 12588:** Continued from May 17, 2001, Examiner Hearing.

Application of Raptor Natural Pipeline, LLC, f/k/a LG&E Energy Corporation, for special rules for the Grama Ridge Morrow Gas Storage Unit, Lea County, New Mexico. Applicant seeks an order establishing special rules applicable to wells drilled and completed or recompleted in the Morrow formation within its Grama Ridge Morrow Gas Storage Unit and within each 320-acre spacing unit immediately adjacent to the Unit in the following described area:

Grama Ridge Morrow Gas Storage Agreement

**Township 21 South, Range 34 East**

Section 33: All  
Section 34: All

**Township 22 South, Range 34 East**

Section 3: All  
Section 4: All  
Section 10: All

Acreage Adjacent to Unit

**Township 21 South, Range 34 East**

Section 26: NW/4, S/2  
Section 27: All  
Section 28: All  
Section 29: E/2, SW/4  
Section 32: All  
Section 35: All

**Township 22 South, Range 34 East**

Section 2: All  
Section 5: All  
Section 8: N/2, SE/4  
Section 9: All  
Section 11: All  
Section 14: N/2, SW/4  
Section 15: All  
Section 16: N/2, SE/4

The application requests the Division establish rules requiring operators of all newly drilled or recompleted wells in the Morrow formation to provide the operator of the Unit with information and data obtained during drilling, completion, and production to determine whether such wells are in

communication with the unitized formation or would otherwise interfere with Unit operations. The special project rules would also include provisions requiring the operators of wells determined to be in communication with the Unitized Interval to demonstrate how such well may be produced without interfering with Unit operations or to take such other action determined to be appropriate. The Grama Ridge Morrow Gas Storage Unit is approximately 18 miles west of Eunice, New Mexico.

**CASE 12441: Continued from May 17, 2001, Examiner Hearing.**

**Application of LG&E Natural Pipeline LLC for special rules for the Grama Ridge Morrow Gas Storage Unit, Lea County, New Mexico.** Applicant seeks an order establishing special rules applicable to wells drilled and completed or recompleted in the Morrow formation within its Grama Ridge Morrow Gas Storage Unit and within each 320-acre spacing unit immediately adjacent to the Unit in the following described area:

**Grama Ridge Morrow Gas Storage Agreement**

Township 21 South, Range 34 East

Section 33: All

Section 34: All

Township 22 South, Range 34 East

Section 3: All

Section 4: All

Section 10: All

**Acreage Adjacent to Unit**

Township 21 South, Range 34 East

Section 26: NW/4, S/2

Section 27: All

Section 28: All

Section 29: E/2, SW/4

Section 32: All

Section 35: All

Township 22 South, Range 34 East

Section 2: All

Section 5: All

Section 8: N/2, SE/4

Section 9: All

Section 11: All

Section 14: N/2, SW/4

Section 15: All

Section 16: N/2, SE/4

The application requests the Division establish rules requiring operators of all newly drilled or recompleted wells in the Morrow formation to provide the operator of the Unit with information and data obtained during drilling, completion, and production to determine whether such wells are in communication with the unitized formation or would otherwise interfere with Unit operations. The special project rules would also include provisions requiring the operators of wells determined to be in communication with the Unitized Interval to demonstrate how such well may be produced without

interfering with Unit operations or to take such other action determined to be appropriate. The Grama Ridge Morrow Gas Storage Unit is approximately 18 miles west of Eunice, New Mexico.