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W. THOMAS KELLAHIN\*

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RECOGNIZED SPECIALIST IN THE AREA OF  
NATURAL RESOURCES-OIL AND GAS LAW

JASON KELLAHIN (RETIRED 1991)

February 19, 2001

**HAND DELIVERED**

Ms. Lori Wrotenbery, Chair  
Oil Conservation Commission  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

**Re: REQUEST FOR HEARING DENOVO**

*Order No. R-11652*

*NMOCD Case 12587*

*Application of Sapient Energy Corp.  
for an unorthodox well location and non-  
standard proration unit or in the alternative  
a 160-acre non-standard proration unit  
Lea County, New Mexico*

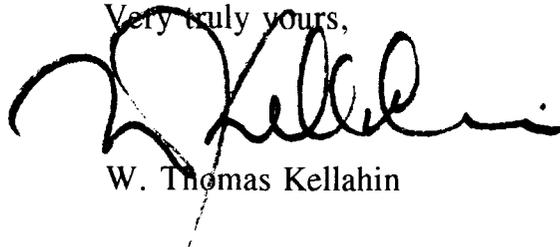
*NMOCD Case 12605*

*Application of Sapient Energy Corp.  
for special pool rules,  
Lea County, New Mexico*

Dear Ms. Wrotenbery:

On behalf of Sapient Energy Corp., please find enclosed our request for a Hearing DeNovo of the referenced cases before the New Mexico Oil Conservation Commission. We request that this matter be set for hearing on the November 9th docket.

Very truly yours,



W. Thomas Kellahin

cc: William F. Carr, Esq.  
Attorney for Conoco Inc.  
cc: Sapient Energy Corp.  
Attn: Chuck Perrin

01 SEP 19 PM 1:40

100-45888-107

**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:**

**CASE NO. 12587**

**APPLICATION OF SAPIENT ENERGY CORP. FOR AN  
UNORTHODOX GAS WELL LOCATIONS AND (i) TWO  
NON-STANDARD 160-ACRE GAS SPACING UNITS;  
OR IN THE ALTERNATIVE (ii) ONE NON-STANDARD  
160-ACRE GAS SPACING AND PRORATION UNIT,  
LEA COUNTY, NEW MEXICO.**

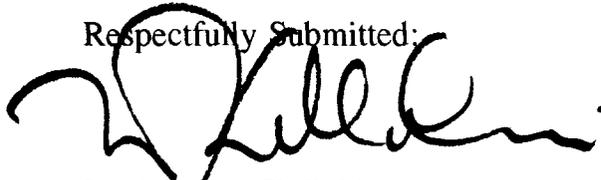
**CASE NO. 12605**

**APPLICATION OF SAPIENT ENERGY CORPORATION  
FOR SPECIAL POOL RULES,  
LEA COUNTY, NEW MEXICO**

**SAPIENT ENERGY CORP.'S  
REQUEST FOR A DE NOVO HEARING  
BEFORE THE  
NEW MEXICO OIL CONSERVATION COMMISSION**

Comes now SAPIENT ENERGY CORP., a party of record before the New Mexico Oil Conservation Division in Cases 12587 and 12605 and adversely affected by Division Order R-11652 entered September 13, 2001, by its attorneys Kellahin & Kellahin and pursuant to NMSA (1978) Section 70-2-13, hereby requests that the New Mexico Oil Conservation Commission hold a HEARING DENOVO in these matters.

Respectfully Submitted:



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Attorneys for Sapient Energy Corp.