

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. 10,412

APPLICATION OF MW PETROLEUM  
CORPORATION/APACHE CORPORATION  
TO AMEND DIVISION ORDER R-9487-A,  
EDDY COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Musselman,  
Owen & King Operating, Inc. as required by the Oil  
Conservation Division.

**APPEARANCES OF PARTIES**

APPLICANT

ATTORNEY

MW Petroleum Corporation/  
Apache Corporation

William F. Carr

OPPOSITION OR OTHER PARTY

ATTORNEY

(1) Musselman, Owen & King  
Operating, Inc.  
507 N. Marienfeld  
Midland, TX 79701  
Attention: Mike Hedrick  
(915) 683-9314

James Bruce  
Hinkle, Cox, Eaton,  
Coffield & Hensley  
500 Marquette, N.W.  
Suite 800  
Albuquerque, N.M. 87102  
(505) 768-1500

(2) Meridian Oil Inc.

W. Thomas Kellahin

**STATEMENT OF CASE**

APPLICANT

OPPOSITION OR OTHER PARTY

Amoco Production Company applied for the unorthodox location for the well subject to Orders R-9487 and R-9487-A, now operated by Apache, and requested an allowable of 48%, which was granted by the Division. Musselman, Owen & King Operating, Inc. did not oppose the case due to its agreement with Amoco (now Apache) on the penalty. There is insufficient reason to increase the allowable, and increasing the allowable will impair the correlative rights of offset owners.

**PROPOSED EVIDENCE**

APPLICANT

WITNESS	EST. TIME	EXHIBITS
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OPPOSITION

WITNESS	EST. TIME	EXHIBITS
<hr/> (Engineer)	25 minutes	(a) Cross-section (b) Penalty calculations

**PROCEDURAL MATTERS**

Respectfully Submitted,

HINKLE, COX, EATON, COFFIELD &  
HENSLEY

BY   
James Bruce  
500 Marquette, N.W.  
Suite 800  
Albuquerque, N.M. 87102  
(505) 768-1500

Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was mailed this 26<sup>th</sup> day of November, 1991 to William F. Carr, P. O. Box 2208 Santa Fe, New Mexico 87504 and W. Thomas Kellahin, P. O. Box 2265, Santa Fe, New Mexico 87504.

By



James Bruce

**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. 10412

IN THE MATTER OF THE APPLICATION  
OF MW PETROLEUM CORPORATION/  
APACHE CORPORATION TO AMEND  
DIVISION ORDER NO. R-9487-A,  
EDDY COUNTY, NEW MEXICO.

**RECEIVED**

NOV 27 1991

OIL CONSERVATION DIV.  
SANTA FE

**PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by William F. Carr, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

MW Petroleum Corporation/Apache Corp.  
c/o Ceci Leonard \_\_\_\_\_  
1500 City West Blvd., Suite 400  
Houston, Texas 77042 \_\_\_\_\_  
(713) 953-5306 \_\_\_\_\_

**ATTORNEY**

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

**OPPOSITION OR OTHER PARTY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Telephone:

name, address, phone and  
contact person

**ATTORNEY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Telephone:

**STATEMENT OF CASE**

**APPLICANT**

MW Petroleum Corporation/Apache Corporation, applicant, seeks to amend Division Order No. R-9487-A, which authorized the drilling of a well at an unorthodox gas well location 2049 feet from the North line and 480 feet from the West line (Unit E) of Section 12, Township 22 South, Range 23 East, N.M.P.M., Indian Basin-Upper Pennsylvanian Gas Pool. Applicant specifically seeks to amend the gas allowable acreage factor assigned to the well by said order. All of Section 12 is dedicated to the subject well forming a standard 640-acre gas spacing and proration unit for said pool.

**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.)

**PROPOSED EVIDENCE**

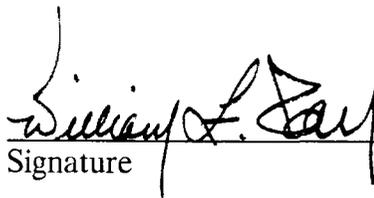
APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Ceci Leonard, Petroleum Engineer	15 Min.	Approximately 3
John Polasek, Geologist	15 Min.	Approximately 3

OPPOSITION

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

  
Signature