

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. 10,692

APPLICATION OF POGO PRODUCING
COMPANY FOR SPECIAL POOL RULES
FOR THE EAST LOVING-DELAWARE
POOL, EDDY COUNTY, NEW MEXICO.

SUPPLEMENTAL
PRE-HEARING STATEMENT

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

APPEARANCE OF PARTIES

APPLICANT

Pogo Producing Company
Post Office Box 10340
Midland, Texas 79701
(915) 682-6822
Attention: Terry Gant

ATTORNEY

James Bruce
Hinkle, Cox, Eaton, Coffield
& Hensley
Post Office Box 2068
Santa Fe, New Mexico 87504-2068
(505) 982-4554

OPPOSITION OR OTHER PARTY

ATTORNEY

STATEMENT OF CASE

APPLICANT

Applicant requests a gas:oil ratio of 8,000:1 for the East Loving-Delaware Pool. The Pool is a solution gas drive reservoir, and thus producing the Pool at a higher GOR will not cause waste.

OPPOSITION

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES

EST. TIME

EXHIBITS

Gary Hoose
(Geologist)

15 minutes

(a) Type log
(b) Structure map
(c) List of producing intervals
(perforations) of wells in Pool.

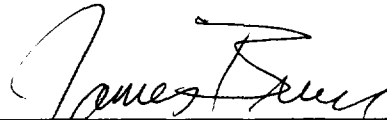
William Foshag
(Engineer)

Mr. Foshag will be available in the event the Examiner needs to ask further questions on engineering matters.

PROCEDURAL MATTERS

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD
& HENSLEY

A handwritten signature in black ink, appearing to read "James Bruce", written over a horizontal line.

James Bruce
Post Office Box 2068
Santa Fe, New Mexico 87504-2068
(505) 982-4554

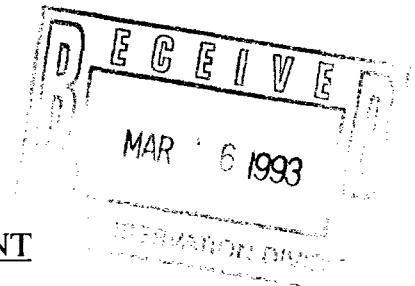
Attorneys for Pogo Producing Company

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. 10,692

APPLICATION OF POGO PRODUCING
COMPANY FOR SPECIAL POOL RULES
FOR THE EAST LOVING-DELAWARE
POOL, EDDY COUNTY, NEW MEXICO.



PRE-HEARING STATEMENT

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

APPEARANCE OF PARTIES

APPLICANT

Pogo Producing Company
Post Office Box 10340
Midland, Texas 79701
(915) 682-6822
Attention: Terry Gant

ATTORNEY

James Bruce
Hinkle, Cox, Eaton, Coffield
& Hensley
Post Office Box 2068
Santa Fe, New Mexico 87504-2068
(505) 982-4554

OPPOSITION OR OTHER PARTY

ATTORNEY

STATEMENT OF CASE

APPLICANT

Applicant requests a gas:oil ratio of 8,000:1 for the East Loving-Delaware Pool. The Pool is a solution gas drive reservoir, and thus producing the Pool at a higher GOR will not cause waste.

OPPOSITION

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
-----------	-----------	----------

OPPOSITION

WITNESSES	EST. TIME	EXHIBITS
-----------	-----------	----------

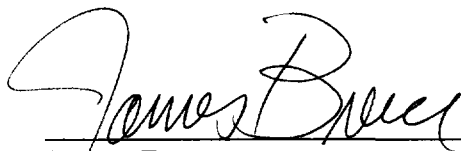
Terry Gant (Landman)	5 minutes	(a) Plat of East Loving Delaware Pool and East Herradura Bend Pools (b) Affidavit Regarding Notice (c) Proof of Publication (d) Letters of Support
-------------------------	-----------	--

WITNESSES	EST. TIME	EXHIBITS		
Charles Vanorsdale (Engineer)	30 minutes	(e) Published material on the nature of solution gas drive reservoirs		
		(f) Plot of bottom hole pressure versus time		
		(g) Graph of oil production rate per well versus time		
		(h) Graph of GOR versus field-wide cumulative oil production		
		(i) Contour map of Brushy Canyon indicating different GORs in the Pool		
		(j) Structure map with cross-section line		
		(k) Cross section through the Pool showing lack of relationship between structure and GOR		
		(l) Excerpt from Craft & Hawkins regarding maximum efficient rates		
		(m) Reservoir simulation from previous testimony, updated with recent well performance		
		William Foshag (Engineer)	25 minutes	(n) Plat of range of GORs throughout the Pool
				(o) Frequency distributions of GORs for various time periods
(p) Graph of relationship between GOR and cumulative oil production				
(q) Spreadsheet on Pool-wide GOR as affected by increased				

PROCEDURAL MATTERS

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD
& HENSLEY

A handwritten signature in cursive script that reads "James Bruce". The signature is written in black ink and is positioned above a horizontal line.

James Bruce
Post Office Box 2068
Santa Fe, New Mexico 87504-2068
(505) 982-4554

Attorneys for Pogo Producing Company