

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

1121-2000
2014 JUL 16 A 11:45

**IN THE MATTER OF THE HEARINGS CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

**APPLICATION OF CONOCOPHILLIPS COMPANY
FOR AN UNORTHODOX OIL WELL LOCATION,
LEA COUNTY, NEW MEXICO.**

Case No. 15,119

**APPLICATION OF CONOCOPHILLIPS COMPANY
FOR AN UNORTHODOX OIL WELL LOCATION,
LEA COUNTY, NEW MEXICO.**

Case No. 15,155

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

ConocoPhillips Company
Post Office Box 2197
Houston, Texas 77252-2197

Attention: Ashley E. Manning-Dyke

APPLICANT'S ATTORNEYS

James Bruce
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(505) 982-2043

Ronald C. Schultz
ConocoPhillips Company
Post Office Box 2197
Houston, Texas 77252
(832) 486-2049

OPPONENT

COG Operating LLC

OPPONENT'S ATTORNEY

Ocean Munds-Dry

STATEMENT OF THE CASE

APPLICANT

Case No. 15.119: ConocoPhillips Company seeks an order approving an unorthodox oil well location in the Glorieta-Yeso formation (West Maljamar-Yeso Pool) for its Emerald Fed. Well No. 9, which has a surface location 420 feet from the south line and 1340 from the east line of Section 17, Township 17 South, Range 32 East, N.M.P.M., and a bottom hole location 258 feet from the south line and 982 feet from the east line of Section 17.

Case No. 15.155: ConocoPhillips Company seeks an order approving an unorthodox oil well location in the Glorieta-Yeso formation (West Maljamar-Yeso Pool) for its Emerald Fed. Well No. 1, which has a surface location 730 feet from the south line and 140 from the east line of Section 17, Township 17 South, Range 32 East, N.M.P.M., and a bottom hole location 191 feet from the south line and 361 feet from the east line of Section 17.

The SE $\frac{1}{4}$ SE $\frac{1}{4}$ of Section 17 is dedicated to both wells.

Although the wells are at unorthodox locations, ConocoPhillips Company has gained no advantage against the offset operator, and the locations should be approved without penalty.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Gene Schwall (drilling engineer)	15 min.	Approx. 2
Matt Wasson (geologist)	20 min.	Approx. 4
Reed Stiles (reservoir engineer)	25 min.	Approx. 6

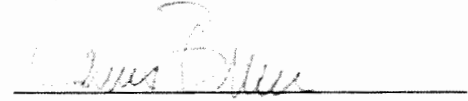
OPPONENT

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

Applicant requests that the cases be consolidated for hearing.

Respectfully submitted,



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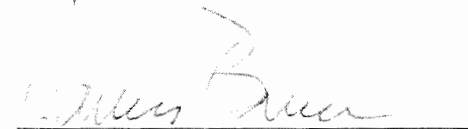
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Attorneys for ConocoPhillips Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 19th day of June, 2014 by e-mail:

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