

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

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

**APPLICATION OF ANSCHUTZ OIL COMPANY,
LLC FOR COMPULSORY POOLING AND
AN UNORTHODOX OIL WELL LOCATION,
RIO ARriba COUNTY, NEW MEXICO.**

Case No. 15,234

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Anschutz Oil Company, LLC
Suite 2400
555 17th Street
Denver, Colorado 80202

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attention: Deidre O'Callaghan
(303) 299-1478

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Anschutz Oil Company, LLC seeks an order pooling of all mineral interests in the Mancos formation underlying the W/2 of Section 14 and all of Section 15 in a non-standard 960 acre spacing and proration unit for any formations and/or pools developed on 640 acre spacing within that vertical extent, including the Gavilan-Mancos Pool. Applicant proposes to drill its Regina Com. 25-2-14-15 Well No. 1H, to a depth sufficient to test the Gavilan-Mancos Pool, and seeks to dedicate the W/2 of Section 14 and all of Section 15 to the well to form a non-standard 960 acre spacing and proration unit for any formations and/or pools developed on 640 acre spacing within that vertical extent. The well is a horizontal well, to be drilled from a surface location in

the NW/4NE/4 of Section 14, with a terminus in the NW/4NW/4 of Section 15. The beginning of the producing interval will be approximately 830 feet from the north line and 2310 feet from the west line of Section 14, to a terminus 830 feet from the north line and 330 feet from the west line of Section 15, which is unorthodox under the special rules and regulations for the Gavilan-Mancos Pool. **The non-standard unit was previously approved by the Division.**

Applicant seeks three things in this case: (1) pooling all non-consenting working interest owners into the well unit; (2) pooling royalty interest owners into the well unit whose leases do not allow pooling of non-standard well units; and (3) approval of an unorthodox oil well location.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Deidre O'Callaghan (landman)	15 min.	Approx. 6
John Michel Richardson (landman)	10 min.	Approx. 4
Monica Stoeber (geologist)	15 min.	Approx. 2

PURSUANT TO THE DIVISION'S RECENT NOTICE, APPLICANT INTENDS TO PRESENT THIS CASE BY AFFIDAVIT.

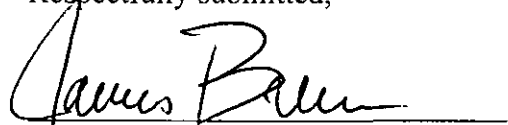
OPPONENT

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

-None-

Respectfully submitted,

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

James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attorney for Anschutz Oil Company, LLC