STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESCOUSE SOBE PARTMENT OIL CONSERVATION DIVISION

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

CASE NO. 13613

APPLICATION OF BP AMERICA PRODUCTION COMPANY FOR AN EXCEPTION TO THE WELL DENSITY REQUIREMENTS FOR THE BLANCO-MESAVERDE GAS POOL, SAN JUAN COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

BP America, Inc. Attn: Mr. J. W. "Bill" Hawkins 1660 Lincoln Street, Suite 3000 Denver, Colorado 80264 (303) 830-3259 William F. Carr, Esq. Holland & Hart LLP Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421

STATEMENT OF CASE

<u>APPLICANT</u>

Applicant in the above-styled cause seeks an exception to the well density requirements of Rule I.B of the Special Rules and Regulations for the Blanco-Mesaverde Gas Pool to permit it to produce the following three Mesaverde wells located in the same quarter section (SE/4) on a standard spacing and proration unit comprised of the East half of Section19, Township 29 North, Range 8 West, NMPM:

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the Hughes B Well No. 2A (API No. 30-045-22716) located 875 from the South line and 1610 feet from the East line (Unit O) of said section;

the Hughes No. 7 Well (**API No. 30-045-24032**) located 875 feet from the South line and 945 feet from the East line (Unit P) of said section; and

the Hughes B Well No. 2B (**API No. 30-045-30937**) which was directionally drilled from at a surface location 895 feet from the South line and 1650 feet from the East line (Unit O) with a bottomhole location 2350 feet from the South line and 1800 feet from the East line (Unit J) of said section.

Said wells are located approximately 5 miles southwest of Navajo City, New Mexico.

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and Expertise) ESTIMATED TIME

EXHIBITS

J. W. Hawkins (Petroleum Engineer) Approx. 20 Minutes

Approx. 6

PROCEDURAL MATTERS

BP America Production Company has none at this time.

William F. Qarr Attorney for BP America Production Company