

**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:**

**APPLICATION OF EL PASO E&P COMPANY,
L.P. TO ABOLISH THE VAN BREMMER CANYON-
VERMEJO GAS POOL, EXPAND THE CASTLE ROCK
PARK- VERMEJO GAS POOL, AND ESTABLISH
SPECIAL RULES AND REGULATIONS FOR THE
CASTLE ROCK PARK-VERMEJO GAS POOL,
COLFAX COUNTY, NEW MEXICO.**

Case No. 14,149

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

El Paso E&P Company, L.P.
Suite 1900
1099 18th Street
Denver, Colorado 80202

Attention: Gregory Reeves
(303) 291-6466

APPLICANT'S ATTORNEY

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order (i) abolishing the Van Bremmer Canyon-Vermejo Gas Pool, (ii) expanding the horizontal extent of the Castle Rock Park-Vermejo Gas Pool to include acreage formerly within the Van Bremmer Canyon-Vermejo Gas Pool, (iii) expanding the horizontal extent of the Castle Rock Park-Vermejo Gas Pool to include additional acreage, and (iv) instituting special rules and regulations for the Castle Rock Park-Vermejo Gas Pool, including: (a) 160 acre well units; (b) wells to be located no closer than 10 feet to a quarter section line or an interior quarter-quarter section line; (c) two wells per well unit, subject to the directional

drilling provisions of NMAC 19.15.3.111; (d) an administrative procedure for an exception to the well density provisions of the pool rules; and (e) a buffer zone where wells must be located in accordance with the Division's statewide well location rules. The Castle Rock Park-Vermejo Gas Pool, as expanded, will include lands in the following townships: 29N-18E, 29N-19E, 30N-17E, 30N-18E, 30N-19E, 31N-17E, and 31N-18E.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Gregory Reeves (landman) <u>gregory.reeves@elpaso.com</u>	20 min.	Approx. 8
Fred Mark (geologist) <u>fred.mark@elpaso.com</u>	20 min.	Approx. 7
Howard Musgrove (engineer) <u>Howard.musgrove@elpaso.com</u>	30 min.	Approx. 6


OPPONENT

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

Applicant requests that this case be consolidated for hearing with Case No. 14150.

Respectfully submitted,


James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for El Paso E&P Company, L.P.