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**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 EXPAND THE STUBBLEFIELD CANYON  
RATON-VERMEJO GAS POOL, AND TO ESTABLISH  
SPECIAL RULES AND REGULATIONS FOR THE  
POOL, COLFAX COUNTY, NEW MEXICO.**

Case No. 14,150

**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 18<sup>th</sup> 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 expanding the horizontal extent of the Stubblefield Canyon Raton-Vermejo Gas Pool, and instituting special rules and regulations for the 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 Stubblefield Canyon Raton-

Vermejo Gas Pool, as expanded, will include lands in the following townships: 30N-19E, 30N-20E, 31N-19E, 31N-20E, 31N-21E, 32N-18E, 32N-19E, 32N-20E, and 32N-21E.

OPPONENT

**PROPOSED EVIDENCE**

APPLICANT

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

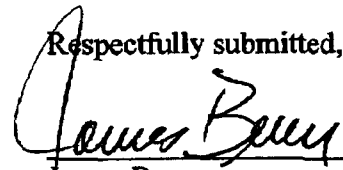
OPPONENT

<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. 14149.

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.