

Brooks, David K., EMNRD

From: Thomas Kellahin [tkellahin@comcast.net]
Sent: Thursday, February 25, 2010 8:57 AM
To: Davidson, Florene, EMNRD
Cc: Brooks, David K., EMNRD; Deanna Poindexter
Subject: Pre-Hearing Statement (Range)
Attachments: Range-PHS-14431 & 14432.PDF

Dear Florene,

Please find attached for filing my pre-hearing statement for the Range Operating New Mexico, Inc's cases 14431 and 14432 current set for hearing on the March 4th docket

Thanks,

Tom Kellahin

Kellahin & Kellahin
Attorneys at Law
706 Gonzales Road
Santa Fe, NM 87501
ph 505.982.4285
Fax 505.216.2780
Email tkellahin@comcast.net

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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 HEARING:

APPLICATION OF RANGE OPERATING NEW MEXICO, INC TO
AMEND DIVISION ORDER R-12344 AND TO AUTHORIZE THE
EXPANSION OF THIS CENTRALIZED FACILITY
EDDY COUNTY, NEW MEXICO CASE 14431

APPLICATION OF RANGE OPERATING NEW MEXICO, INC
FOR A CENTRALIZED FACILITY WITH AN OFF-LEASE
MEASUREMENT, STORAGE AND POINT INCLUDING SURFACE
COMMINGLING, EDDY COUNTY, NEW MEXICO CASE 14432

CONSOLIDATED
PRE-HEARING STATEMENT

Range Operating New Mexico, Inc. submits this pre-hearing statement as required by the
New Mexico Oil Conservation Division.

APPEARANCES OF THE PARTIES

APPLICANT	ATTORNEY
Range Operating New Mexico, Inc. 777 Main St. Suite 800 Fort Worth, Texas 76102 Attn: Robert Ebeier 817-870-2601	Thomas Kellahin, Esq. 706 Gonzales Road Santa Fe, New Mexico 87501 505-982-4285

OPPONENTS

None

ATTORNEY

STATEMENT OF THE CASE

APPLICANT:

In CASE 14431, Range Operating New Mexico, Inc. seeks to amend Division order R-12444 and to authorize the expansion of this centralized facility with additional acreage and wells including common tank batteries, surface commingling, off-lease measurement and storage for its SCB3B Battery and Sales Point Project, Eddy County, New Mexico. Applicant seeks to amend Order R-12344 for its SCB 5B Battery and Sales Point located in Unit G of Section 23, T23R, R28E for a project area and wells within parts of Section 13, 14, 23 and 24 of this township.

In CASE 14432, Range Operating New Mexico, Inc. for a centralized facility with an off-lease measurement, storage and sales point including surface commingling, Eddy County, New Mexico. Applicant, seeks an order granting an exception to Rules 19.15.12.10.C NMAC and 19.15.23.9 NMAC, for its SCB 5B Battery and Sales Point located in Unit L of Section 13, T23R, R28E for a project area and wells within parts of Section 11, 12, 13 and 14 of this township. The applicant further seeks the adoption of an administrative procedure for the expansion of this facility including the addition of other wells and production from other pools.

The area for Case 14431 is on the south side of the Pecos River while the area for Case 14432 is on the north side of the Pecos River

In order to save time, a consolidated presentation can be made because the key facts are similar in both cases and the witness is the same. Applicant requests a separate order be entered in each case.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

Deauna Poindexter (PE)

EST. TIME

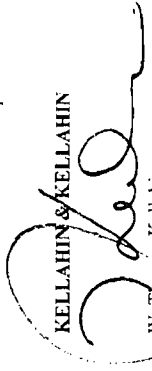
30-40 min

EST. EXHIBITS

@ 20

PROCEDURAL MATTERS

Applicant request that these two cases be consolidated for presentation.


KELLAHIN & KELLAHIN
W. Thomas Kellahin
706 Gonzales Road
Santa Fe, New Mexico 87501
Phone 505-982-4285
Fax 505-982-2047
E-mail: tkellahin@comcast.net

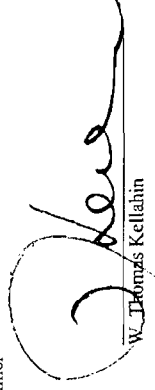
CERTIFICATE OF SERVICE

I certify that on February 25, 2010, I served a copy of the foregoing documents by:

- ☐ US Mail, postage prepaid
- ☐ Hand Delivery
- ☐ Facsimile
- ☒ E-mail

to the following:

David K. Brooks, Esq.
Attorney for OCD Examiner


W. Thomas Kellahin