

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

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
COMMISSION FOR THE PURPOSE OF
CONSIDERING THE AMENDMENT OF
RULE 303

CASE NO. 11,353

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Pogo
Producing Company as required by the Oil Conservation
Commission.

APPEARANCE OF PARTIES

Applicant:

Oil Conservation Division

Other Party:

Pogo Producing Company
Post Office Box 10340
Midland, Texas 79701

Attn: Terry Gant
(915) 682-6822

Attorney:

Rand Carroll

Attorney:

James Bruce
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& Hensley, P.L.L.C., Ltd., Co.
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STATEMENT OF CASE

Applicant:

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Oil Conservation Division

Other Party:

Pogo Producing Company proposes that Rule 303 be amended as follows:

1. Delete current Rule C(1)(a)(i) and replace it with the following language:

The total combined daily oil production from oil zones before commingling (as determined in accordance with Section D, paragraphs (4) and (5) below) does not exceed the depth bracket allowable for the uppermost zone, as fixed by Division Rule 505.

2. Add the following language to Rule C(1)(a)(iii):

The well operator shall provide to the Division proof that the operator has or will acquire sufficient lifting capacity to lift total produced fluids.

3. Amend Rule 303(D)(4) to read:

The latest productivity test (minimum 24 hour test) on Division Form C-116 showing the amount of oil, gas, and water produced from each zone. (Underlined language is new.)

These changes are proposed to allow administrative approval of commingling earlier in the life of a well, allowing more economical production of two or more reservoirs even though one zone may be producing at relatively high rates. This will accelerate recovery and lower operating costs, and in many instances increase the amount of recovered hydrocarbons.

PROPOSED EVIDENCE

Applicant:

WITNESSES

ESTIMATED TIME

EXHIBITS

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Other Party:

WITNESSES	ESTIMATED TIME	EXHIBITS
Terry Gant (Landman)	5 min.	Rule Proposals
Vance Usher (Engineer)	10 min.	Production Data
Barrett Smith (Operations Engineer)	10 min.	

PROCEDURAL MATTERS

- None -

HINKLE, COX, EATON, COFFIELD
& HENSLEY, P.L.L.C., Ltd. Co.

By:



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Attorneys for Pogo Producing Company

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Certificate of Service

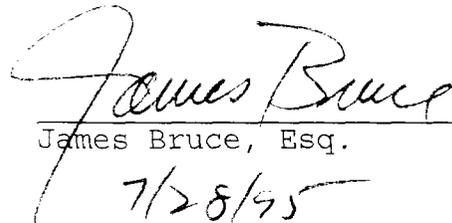
I hereby certify that I caused a true copy of this Pre-Hearing Statement to be sent by first class mail to:

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7/28/95