

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:

M.S. ✓
ORC ✓

APPLICATION OF KERR-MCGEE OIL & GAS
ONSHORE LLC TO EXTEND THE TIME DURING
WHICH IT MAY MAKE UP UNDERPRODUCTION
IN A GAS PRORATION UNIT IN THE INDIAN
BASIN-UPPER PENNSYLVANIAN GAS POOL,
EDDY COUNTY, NEW MEXICO.

Case No. 12537

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Kerr-McGee Oil & Gas
Onshore LLC
14311 Welch Road
Dallas, Texas 75244
Attention: Steve Foerster
(972) 715-4608

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

OPPONENT

STATEMENT OF THE CASE

APPLICANT

Applicant is underproduced in its Conoco State well unit,
comprising all of Section 2, Township 22 South, Range 23 East,
NMPM. Due to lack of gas plant capacity, applicant will not be
able to make up the underproduction during the time allowed by the
rules for prorated gas pools. Therefore, applicant requests an
extension of time during which to make up the underproduction.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Steve Foerster (landman)	5 min.	Two
_____	10 min.	Two
(geologist)		
Joe Martin (engineer)	20 min.	Six

OPPONENT

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

-None-

Respectfully submitted,



James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Kerr-McGee Oil & Gas Onshore LLC