## KELLAHIN AND KELLAHIN

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November 28, 2001

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W. THOMAS KELLAHIN'

\*NEW MEXICO BOARD OF LEGAL SPECIALIZATION RECOGNIZED SPECIALIST IN THE AREA OF NATURAL RESOURCES OIL AND GAS LAW

JASON KELLAHIN (RETIRED 1991)

Ms. Lori Wrotenbery. Chair Dr. Robert Lee, Member Ms. Jamie Bailey, Member

Oil Conservation Commission 1220 South Saint Francis Drive Santa Fe, New Mexico 87505

Re: REVISED PRE-HEARING STATEMENT

> COMMISSION DENOVO HEARING Order No. R-11652 NMOCD Case 12587: Application of Sapient Energy Corp. for an unorthodox well location and nonstandard proration units, Lea County, New Mexico

NMOCD Case 12605: Application of Sapient Energy Corp. for special pool rules for the West Monument Tubb Gas Pool, Lea County, New Mexico

Dear Members of the Commission:

On behalf of Sapient Energy Corp. ("Sapient") and in accordance with correspondence from the Commission's attorney, please find enclosed Sapient's Revised Prehearing Statement and its additional proposed exhibits for the hearing scheduled for December 4, 2001.

On November 6, 2001, I provided each of you with a set of Sapient's exhibits and would appreciate you bringing your copy of that exhibit book along with the enclosed supplemental filings to the hearing.

Thomas Kellahin

copy with enclosures:

Steve Ross, Esq.

Attorney for Commission

William F. Carr, Esq.

Attorney for Conoco Inc.

Sapient Energy Corp.

Attn: Chuck Perrin

Amerada Hess Corporation

Attn: James Bruce, Esq.

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JASON KELLAHIN (RETIRED 1991) November 1, 2001

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\*NEW MEXICO BOARD OF LEGAL SPECIALIZATION RECOGNIZED SPECIALIST IN THE AREA OF NATURAL RESOURCES-OIL AND GAS LAW

W. THOMAS KELLAHIN"

Ms. Lori Wrotenbery, Chair Dr. Robert Lee, Member Ms. Jamie Bailey, Member

Oil Conservation Commission 1220 South Saint Francis Drive Santa Fe, New Mexico 87505

Re: COMMISSION DENOVO HEARING

Order No. R-11652

NMOCD Case 12587: Application of Sapient Energy Corp.

for an unorthodox well location and nonstandard proration units, Lea County, New Mexico

NMOCD Case 12605: Application of Sapient Energy Corp. for special pool rules for the West Monument Tubb Gas Pool,

Lea County, New Mexico

Dear Members of the Commission:

On behalf of Sapient Energy Corp. ("Sapient") and in accordance with correspondence from the Commission's attorney, please find enclosed Sapient's Exhibit Book which includes its Prehearing Statement and its proposed exhibits and supporting documentation for the hearing scheduled for November 6, 2001.

I have prepared only a limited number of these exhibit books and would appreciate you bringing your copy of the exhibit book to the hearing.

homas Kellahin

copy with enclosures:

Steve Ross, Esq.

Attorney for Commission

William F. Carr, Esq.

Attorney for Conoco Inc.

Sapient Energy Corp.

Attn: Chuck Perrin