### 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:

CASE NO. 12587

APPLICATION OF SAPIENT ENERGY CORP. FOR AN UNORTHODOX GAS WELL LOCATIONS AND (i) TWO NON-STANDARD 160-ACRE GAS SPACING UNITS; OR IN THE ALTERNATIVE (ii) ONE NON-STANDARD 160-ACRE GAS SPACING AND PRORATION UNIT, LEA COUNTY, NEW MEXICO.

CASE NO. 12605

### APPLICATION OF SAPIENT ENERGY CORPORATION FOR SPECIAL POOL RULES, LEA COUNTY, NEW MEXICO

## SAPIENT ENERGY CORP.'S REQUEST FOR A DE NOVO HEARING BEFORE THE NEW MEXICO OIL CONSERVATION COMMISSION

Comes now SAPIENT ENERGY CORP., a party of record before the New Mexico Oil Conservation Division in Cases 12587 and 12605 and adversely affected by Division Order R-11652 entered September 13, 2001, by its attorneys Kellahin & Kellahin and pursuant to NMSA (1978) Section 70-2-13, hereby requests that the New Mexico Oil Conservation Commission hold a HEARING DENOVO in these matters.

Re nectfu

W. Thomas Kellahin Kellahin & Kellahin P. O. Box 2265 Santa Fe, New Mexico 87501 (505) 982-4285 Attorneys for Sapient Energy Corp.



KELLAHIN AND KELLAHIN

W. THOMAS KELLAHIN\*

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

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February 19, 2001

#### HAND DELIVERED

Ms. Lori Wrotenbery, Chair Oil Conservation Commission 1220 South Saint Francis Drive Santa Fe, New Mexico 87505

Re: REQUEST FOR HEARING DENOVO Order No. R-11652 NMOCD Case 12587 Application of Sapient Energy Corp. for an unorthodox well location and nonstandard proration unit or in the alternative a 160-acre non-standard proration unit Lea County, New Mexico

> NMOCD Case 12605 Application of Sapient Energy Corp. for special pool rules, Lea County, New Mexico

Dear Ms. Wrotenbery:

On behalf of Sapient Energy Corp., please find enclosed our request for a Hearing DeNovo of the referenced cases before the New Mexico Oil Conservation Commission. We request that this matter be set for hearing on the November 9th docket.

Thomas Kellahin

cc: William F. Carr, Esq. Attorney for Conoco Inc. cc: Sapient Energy Corp. Attn: Chuck Perrin