

The SE/4 to form a standard 160-acre gas spacing and proration unit for any formations and/or pools developed on 160-acre spacing within that vertical extent; and the E/2 to form a standard 320-acre gas spacing and proration unit for any formations and/or pools developed on 320-acre spacing within that vertical extent, including the Undesignated East Red Tank-Cisco Canyon Gas Pool, Undesignated East Red Tank-Atoka Gas Pool, Undesignated East Red Tank-Morrow Gas Pool, and Undesignated Bootleg Ridge-Morrow Gas Pool. The units are to be dedicated to a well to be drilled at an orthodox location in the NE/4 SE/4 of Section 23. **IN THE ALTERNATIVE**, applicant requests that the S/2 of Section 23 be dedicated to the well for all pools or formations developed on 320-acre spacing within that vertical extent, including those described above. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a charge for the risk involved in drilling and completing the well. The units are located approximately 12½ miles southeast of the intersection of State Highway 176 and U.S. Highway 62/180.

**CASE 12628:** Continued from April 17, 2001, Examiner Hearing.

**Application of Pogo Producing Company for compulsory pooling, Lea County, New Mexico.** Applicant seeks an order pooling all mineral interests from the surface to the base of the Morrow formation underlying the following described acreage in Section 24, Township 22 South, Range 32 East: The S/2 to form a standard 320-acre gas spacing and proration unit for any formations and/or pools developed on 320-acre spacing within that vertical extent, including the Undesignated East Red Tank-Cisco Canyon Gas Pool, Undesignated East Red Tank-Atoka Gas Pool, Undesignated East Red Tank-Morrow Gas Pool, and Undesignated Bootleg Ridge-Morrow Gas Pool; the SW/4 to form a standard 160-acre gas spacing and proration unit for any formations and/or pools developed on 160-acre spacing within that vertical extent; and the NW/4 SW/4 to form a standard 40-acre oil spacing and proration unit for any formations and/or pools developed on 40-acre spacing within that vertical extent, including the West Red Tank-Delaware Pool and Red Tank-Bone Spring Pool. The units are to be dedicated to a well to be drilled at an orthodox location in the NW/4 SW/4 of Section 24. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a charge for the risk involved in drilling and completing the well. The units are located approximately 13 miles southeast of the intersection of State Highway 176 and U.S. Highway 62/180.

**CASE 12655:** **Application of C. W. Trainer for compulsory pooling, Lea County, New Mexico.** Applicant seeks an order pooling all mineral interests from the surface to the base of the Morrow formation underlying the following described acreage in Section 24, Township 22 South, Range 32 East: The S/2 to form a standard 320-acre gas spacing and proration unit for any formations and/or pools developed on 320-acre spacing within that vertical extent, including the undesignated East Red Tank-Cisco Canyon Gas Pool, the undesignated East Red Tank-Atoka Gas Pool, the undesignated East Red Tank-Morrow Gas Pool, and the undesignated Bootleg Ridge-Morrow Pool; the SW/4 to form a standard 160-acre gas spacing and proration unit for any formations and/or pools developed on 160-acre spacing within the vertical extent; and the NW/4 SW/4 to form a standard 40-acre spacing and proration unit for any formations and/or pools developed on 40-acre spacing within that vertical extent, including the West Red Tank-Delaware Pool and the Red Tank-Bone Springs Pool. The units are to be dedicated to a well located in the NW/4 SW/4 of Section 24. Also to be considered will be the cost of drilling and completing the well and the allocation of costs thereof, as well as the actual operating costs and charges for supervision, designation of the Applicant as operator of the well, and a charge for the risk of drilling and completing the well. The units are located approximately 13 miles southeast of the intersection of State Highway 176 and U. S. Highway 62-180.

**CASE 12656: In the matter of the hearing called by the Oil Conservation Division for an order creating and extending certain pools in Chaves and Eddy Counties, New Mexico.**

(a) CREATE a new pool in Eddy County, New Mexico classified as an oil pool for Delaware production and designated as the Benson-Delaware Pool. The discovery well is the Chi Operating, Inc. Munchkin Federal Well No. 1 located in Unit N of Section 1, Township 19 South, Range 30 East, NMPM. Said pool would comprise:

TOWNSHIP 19 SOUTH, RANGE 30 EAST, NMPM  
Section 1: SW/4

(b) CREATE a new pool in Eddy County, New Mexico classified as a gas pool for Morrow production and designated as the Greenwood-Morrow Gas Pool. The discovery well is the Lynx Petroleum Consultants, Inc. Radar "24" Federal Well No. 1 located in Unit C of Section 24, Township 19 South, Range 31 East, NMPM. Said pool would comprise:

TOWNSHIP 19 SOUTH, RANGE 31 EAST, NMPM  
Section 24: All

(c) CREATE a new pool in Eddy County, New Mexico classified as a gas pool for Wolfcamp production and designated as the Southwest Ross Draw-Wolfcamp Gas Pool. The discovery well is the EOG Resources, Inc. Ross Draw "31" Well No. 1 located in Unit G of Section 31, Township 26 South, Range 30 East, NMPM. Said pool would comprise:

TOWNSHIP 26 SOUTH, RANGE 30 EAST, NMPM  
Section 31: All

(d) CREATE a new pool in Eddy County, New Mexico classified as an oil pool for Bone Spring production and designated as the U.S.-Bone Spring Pool. The discovery well is the Bass Enterprises Production Company Big Eddy Unit Well No. 38 located in Unit C of Section 34, Township 21 South, Range 29 East, NMPM. Said pool would comprise:

TOWNSHIP 21 SOUTH, RANGE 29 EAST, NMPM  
Section 34: NW/4

(e) EXTEND the Artesia-Glorieta-Yeso Pool in Eddy County, New Mexico to include:

TOWNSHIP 17 SOUTH, RANGE 28 EAST, NMPM  
Section 35: NE/4

(f) EXTEND the East Carlsbad-Morrow Gas Pool in Eddy County, New Mexico to include:

TOWNSHIP 21 SOUTH, RANGE 27 EAST, NMPM  
Section 27: N/2

(g) EXTEND the Cedar Canyon-Delaware Pool in Eddy County, New Mexico to include:

TOWNSHIP 24 SOUTH, RANGE 29 EAST, NMPM  
Section 10: SW/4



**LTR**



**Job separation sheet**

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

**IN THE MATTER OF THE APPLICATION OF: :**  
**POGO PRODUCING COMPANY FOR : CASE NO. 12628**  
**COMPULSORY POOLING, LEA COUNTY, :**  
**NEW MEXICO. :**

**PRE-HEARING STATEMENT**

**This pre-hearing statement is submitted by C. W. Trainer, Elizabeth Losee, and Ann Losee, in conditional support of the Pogo Producing Company Application and in support of the Application of C. W. Trainer which has not as yet been assigned a docket number.**

## APPEARANCES OF PARTIES

**APPLICANT**

**ATTORNEY**

**Pogo Producing Company**  
**P. O. Box 10340**  
**Midland, Texas 79702-7340**

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

**APPLICANT**

**ATTORNEY**

**C. W. Trainer  
P. O. Box 754  
Midland, Texas 79702**

**Joel M. Carson**  
P. O. Box 1720  
Artesia, New Mexico 88210  
(505/746-3505)

## CONDITIONAL SUPPORTING PARTIES

**ATTORNEY**

C. W. Trainer  
Elizabeth Losee  
Ann Losee

Joel M. Carson  
Losee, Carson, Haas & Carroll, P.A.  
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**OPPOSITION OR OTHER PARTY**

EOG Resources, Inc.  
P. O. Box 2267  
Midland, Texas 79702

**ATTORNEY**

William F. Carr  
Campbell, Carr, Berge & Sheridan, P.A.  
P. O. Box 2208  
Santa Fe, New Mexico 87504-2208  
(505/988-4421)

**STATEMENT OF CASE****CONDITIONAL SUPPORTING PARTIES**

The Conditional Supporting Parties support the application of Pogo Producing Company for compulsory pooling in the S/2 of Section 24, Township 22 South, Range 32 East, NMPM, Lea County, New Mexico, with the well to be drilled at an orthodox location in the NW/4 SW/4 of said Section 24. EOG, which has 99% of the working interest in the N/2 of Section 24, is producing its Red Tank 24 Federal No. 1 Well at rates approximating 30 million mcf per day. Upon information and belief, this well is draining a substantial portion of the S/2 of said Section 24 where EOG has approximately a 51% working interest. The Conditional Supporting Parties support the application of Pogo upon the condition that the force pooled well be commenced on or before May 15, 2001 to reduce further drainage of their interests in the S/2 of Section 24. The Conditional Supporting Parties support the Application of C. W. Trainer for compulsory pooling for a location in the S/2 of Section 24, Township 22 South, Range 32 East, NMPM, in order to protect their correlative rights for the reasons stated in the paragraph above.

**OPPOSITION OR OTHER PARTY**

EOG Resources, Inc.  
P. O. Box 2267  
Midland, Texas 79702

**PROPOSED EVIDENCE**

WITNESSES	EST. TIME	EXHIBITS
C. W. Trainer P. O. Box 754 Midland, Texas 79702	15 minutes	3
Lynn Charuk 2401 Stutz Pl. Midland, Texas 79701 Geologist	30 minutes	2
Roy C. Williams, Jr. 550 W. Texas Avenue, Suite 300 Midland, Texas 79701-4257 Petroleum Engineer	1 hr.	2

Respectfully submitted,

LOSEE, CARSON, HAAS & CARROLL, P.A.

By: 

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P. O. Box 1720  
Artesia, New Mexico 88211-1720  
(505/746-3505)

Attorneys for C. W. Trainer,  
Elizabeth Losce, and Ann Losce