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:

APPLICATION OF PACIFIC ENTERPRISES OIL CASE NO. 10249 COMPANY (USA) FOR A NON-STANDARD GAS PRORATION UNIT AND AN UNORTHODOX GAS WELL LOCATION, EDDY COUNTY, NEW MEXICO

APPLICATION OF PACIFIC ENTERPRISES OIL CASE NO. 10250 COMPANY (USA) FOR THE RESCISSION OF SPECIAL POOL RULES AND FOR TWO NON-STANDARD 640-ACRE GAS PRORATION UNITS, OR IN THE ALTERNATIVE, TO AMEND DIVISION ORDER NO. 4-2917, AS AMENDED, EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by PACIFIC ENTERPRISES OIL COMPANY (USA) as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT (name, address, phone and contact person)

ATTORNEY

Pacific Enterprises Oil Co. W. Thomas Kellahin P.O. Box 3083 Midland, TX 79702 P.O. Box 2265 (915) 684-3861 Attn: Craig Clark (505) 982-4285

OPPOSITION OR OTHER PARTY ATTORNEY (name, address, phone and contact person)

KELLAHIN, KELLAHIN & AUBREY Santa Fe, New Mexico 87504

RECEIVED

MAR 0 1 1991

OIL CONSERVATION OIV. SANTA FE

Pre-hearing Statement NMOCD Case No. 10249 and 10250 Page 2

STATEMENT OF CASE

<u>APPLICANT</u> (Please make a concise statement of what is being sought with this application and the reasons therefore.)

In Case No. 10249, Pacific Enterprises Oil Company (USA) seeks an exception to the current Special Rules and Regulations for the McMillan-Morrow Gas Pool, as promulgated by Division Order No. R-2917, as amended, and to establish a non-standard 320-acre gas spacing and proration unit comprising the S/2 of Section 18, T20S, R27E, to be dedicated to a well to be drilled at an unorthodox gas well location 660 feet FSL and 1980 feet FWL of Said Section 18.

In Case No. 10250, Pacific seeks the rescission of the Special Rules and Regulations for the spacing and location of wells in the McMillan-Morrow Gas Pool, comprising Sections 13 and 24, T2OS, R26E, and Sections 7, 18, and 19, T20S, R27E, and seeks to have said pool governed by the provisions of General Rule 104.C.II(a) for gas pools of Pennsylvanian age. Further, Pacific requests the concomitant creation of two non-standard 640-acre gas spacing and proration units for the McMillan-Morrow Gas Pool in Section 13, T2OS, R26E, for the existing Yates Drilling Company Pecos River Deep Unit located in Unit H of said Section 13 and in Section 19, T20S, R27E, for the existing Presidio Exploration Inc. State "I" Com Well No. 1 located in Unit F of Section 19, T20S, R27E. In the alternative, Pacific seeks to amend the current Rules and Regulations for said McMillan-Morrow Gas Pool, as promulgated by Division Order No. R-2917, as amended, to permit the optional drilling of an additional well on each 640-acre proration unit.

OPPOSITION OR OTHER PARTY (Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.) Pre-hearing Statement NMOCD Case No. 10249 and 10250 Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
Craig Clark (landman)	10 Min.	6 total
Paul Lerwick (PE)	20 Min.	
Dave Cromwell (geologist)	10 Min.	

OPPOSITION

WITNESSES	EST. TIME	EXHIBITS
(name and expertise)		

PROCEDURAL MATTERS

(Please identify any procedural matters which need to be resolved prior to the hearing)

KELLAHIN, KELLAHIN & AUBREY By: Thomas Kellahin P.O. Box 2265 Santa Fe, New Mexico 87504 (505) 982-4285