## 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. 10226 (De Novo)

APPLICATION OF BIRD CREEK RESOURCES FOR SPECIAL POOL RULES, EDDY COUNTY, NEW MEXICO.

AUG 2 6 1991

RECEIVED

OIL CONSERVATION DIVISION

## **PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by William F. Carr, as required by the Oil Conservation Division.

### **APPEARANCES OF PARTIES**

APPLICANT

## ATTORNEY

William F. Carr

Bird Creek Resources	
c/o Brad Burks	
810 South Cincinnati, Suite 110	
Tulsa, Oklahoma 74119	
(918) 582-3855	

name, address, phone and contact person

## OPPOSITION OR OTHER PARTY

ORYX Energy Company\_\_\_\_\_

name, address, phone and cortact person

 Post Office Box 2208

 Santa Fe, New Mexico 87504

 (505) 988-4421

Campbell, Carr, Berge & Sheridan, P.A.

### ATTORNEY

W. Thomas Kellahin\_\_\_\_\_ Kellahin, Kellahin & Aubrey\_\_\_\_ Post Office Box 2265\_\_\_\_\_ Santa Fe, New Mexico 87504\_\_\_\_\_ (505) 982-4285 Pre-hearing Statement NMOCD Case No. 10226 (De Novo) Page 2

## STATEMENT OF CASE

### <u>APPLICANT</u>

Bird Creek Resources, applicant, seeks an order promulgating special rules and regulations for the East Loving-Delaware Pool including a provision for a limiting gas-oil ratio of 5000 cubic feet of gas per barrel of oil. Said pool is located in Township 23 South, Range 28 East.

# 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.)

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## **PROPOSED EVIDENCE**

<u>APPLICANT</u>

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Brad Burss, Petroleum Engineer	20 Min.	Approximately 8
Charles Van Orsdale, Petroleum Engineer	20 Min.	Approximately 6

**OPPOSITION** 

WITNESSES (Name and expertise) EST. TIME

**EXHIBITS** 

# **PROCEDURAL MATTERS**

None.

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### 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. 10226 (DeNovo)

APPLICATION OF BIRD CREEK RESOURCES FOR SPECIAL POOL RULES FOR THE EAST LOVING-DELAWARE POOL, EDDY COUNTY, NEW MEXICO

RECEIVED

AUG 2 0 1991

OIL CONSERVATION DIVISION

### PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Oryx Energy Company as required by the Oil Conservation Division.

### **APPEARANCE OF PARTIES**

APPLICANT

### ATTORNEY

BIRD CREEK RESOURCES

William F. Carr CAMPBELL & BLACK, P.A. P.O. Box 2208 Santa Fe, NM 87504

OPPOSITION OR OTHER PARTY

ATTORNEY

ORYX ENERGY COMPANIESW. Thomas KellahinP.O. Eox 2880KELLAHIN, KELLAHIN & AUBREYDallas, TX 75231P.O. Box 2265ATTN: Charles GraySanta Fe, NM 87504(214) 890-6259(505) 982-4285

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R.C. BENNETT AND R.B. OPERATING INC.

James Bruce HINKLE, COX, EATON, COFFIELD, & HENSLEY 500 Marguette, Suite 740 Albuquerque, NM 87102 (505) 768-1500

### STATEMENT OF CASE

### APPLICANT

N/A

### OPPOSITION OR OTHER PARTY

Oryx Energy Company opposes the applicant's request for an increased gas-oil ratio for this pool. It is premature to increase the gas-oil ratio in the pool at this time and doing so will reduce ultimate oil recovery. Increasing the gas-oil ratio will violate correlative rights by disrupting drainage and recoveries of oil per tract. The application should be denied.

### PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME EXHIBITS

SEE APPLICANT FILING

Pre-Hearing Statement Case No. 10226 Page 3

OPPOSITION

WITNESSES	EST. TIME	EXHIBITS
Bonnie Wilson (Petroleum Engineer)	60 Min.	Structure and Isopath Cross- Section
Bob S:.dlowe (Geologist)	45 Min.	Geology
		Conventional
Gregg Jacobson (Petroleum Engineer)	45 Min.	Engineering Data and Calculation Reservoir Simulation

### PROCEDURAL MATTERS

None applicable at this time.

KELLAHIN, KELLAHIN & AUBREY

By:

Study

W. Thomas Kellahin P.O. Box 2265 Santa Fe, New Mexico 87504 (505) 982-4285

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