# STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPRECEDED

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

FEB 15 1991

OIL CONSERVATION DIV. SANTA FE

CASE NO. 10245

APPLICATION OF CONOCO INC. FOR POOL CREATION, SPECIAL POOL RULES, AND CONTRACTION OF THE BLINEBRY OIL AND GAS AND WARREN-TUBB GAS POOLS, LEA COUNTY, NEW MEXICO

## PRE-HEARING STATEMENT

This pre-hearing statement is submitted by CONOCO, INC. as required by the Oil Conservation Division.

## APPEARANCE OF PARTIES

APPLICANT (name, address, phone and contact person)

ATTORNEY

Conoco Inc. 10 Desta Drive West Midland, TX 79705 (915) 686-5400 Attn: Jerry Hoover

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

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

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#### STATEMENT OF CASE

#### APPLICANT

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

Conoco Inc. seeks the creation of a new oil and gas pool for Blinebry and Tubb production comprising all or portions of Section 22, 26, 27, 33, 34, and 35, T2OS, R38E, to be designated the Warren Blinebry-Tubb Oil and Gas Pool, and the promulgation of special pool rules therefor, including a provision to allow for simultaneous dedication of pool acreage to both oil and gas wells, special gas allowable considerations, any other provisions deemed necessary for such a pool. Conoco also seeks the concomitant contraction of the Blinebry Oil and Gas Pool and the Warren-Tubb Gas Pool and the creation of a new gas pool for Tubb production comprising the SE/4 of Section 23, SW/4 of Section 24, W/2 of Section 25 and the NW/4 of Section 36, T2OS, R38E.

## 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. 10245 Page 3

#### PROPOSED EVIDENCE

## APPLICANT

WITNESSES EST. TIME EXHIBITS (name and expertise)

NONE.

## OPPOSITION OR OTHER PARTY

WITNESSES EST. TIME EXHIBITS (name and expertise)

## PROCEDURAL MATTERS

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

The evidence for the subject case was presented at the January 24, 1991 hearing in Case 10220 in which applicant sought approval of the Warren Unit North Blinebry Waterflood Project.

Applicant will move that the Examiner incorporate the record in Case 10220 into the subject case and in the absence of objections take the subject case under advisement.

KELLAHIN, KELLAHIN & AUBREY

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