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



FEB 1 5 1991

OIL CONSERVATION DIV. SANTA FE

# CASE MCCIERT

APPLICATION OF CONOCO INC. FOR AN UNORTHODOX OIL WELL LOCATION, LEA COUNTY, NEW MEXICO

IN THE MATTER OF THE HEARING

CONSIDERING:

CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF

FEB 1 5 1991

OIL CONSERVATION DIV. SANTA FE

### 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 (name, address, phone and contact person)

ATTORNEY

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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 approval of an unorthodox oil well location for its Burger B-20 Well No. 4 to be drilled 2200 feet FNL and 2450 feet FWL (Unit F) of Section 20, T20S, R38E, Warren-McKee Pool. The SE/4NW/4 of said Section 20 is to be dedicated to said well forming a standard 40-acre oil spacing and proration unit for said pool.

<u>OPPOSITION OR OTHER PARTY</u> (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. 10246 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)

Applicant requests this case be dismissed without prejudice.

KELLAHIN, KELLAHIN & AUBREY By:

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