

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. 10289

APPLICATION OF BHP PETROLEUM (AMERICAS)
INC. FOR AMENDMENT OF DIVISION ORDER
R-9351, LEA COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by BHP
PETROLEUM (AMERICAS) INC. as required by the Oil
Conservation Division.

APPEARANCE OF PARTIES

APPLICANT
(name, address, phone
and contact person)

BHP Petroleum Company Inc.
5847 San Felipe, Ste. 3600
Houston, Texas 77057
Attn: Steve Mahanay
(713) 780-5000

ATTORNEY

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

RECEIVED

APR 12 1991
OIL CONSERVATION DIVISION
SANTA FE

STATEMENT OF CASE

APPLICANT

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

Division Order No. R-9351 authorized an unorthodox oil well location to test the Strawn formation 1250 feet FSL and 1725 feet FEL (Unit O) of Section 20, T17S, R37E, whereby the SW/4SE/4 of said Section 20 would be dedicated to said well to form a standard 40-acre oil proration unit.

BHP Petroleum (Americas) Inc. seeks to deepen its Kimbrough State Well No. 1 to the base of the Devonian formation and to amend said Order No. R-9351 to include all formations from the base of the Strawn formation to the base of the Devonian formation in the provisions set forth in said Order.

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.)

PROPOSED EVIDENCE

APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
Randall Davis (landman)	15 Min.	Land Plat
William Morris (geologist)	15 Min.	Devonian Prod. Map Strawn Structure Map


OPPOSITION

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

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

KELLAHIN, KELLAHIN & AUBREY

By: 
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