

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

RECEIVED

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

JUL 05 1991

OIL CONSERVATION DIV.
SANTA FE

CASE NO. 10348

APPLICATION OF KLM OIL & GAS FOR
A HIGH ANGLE/HORIZONTAL DIRECTIONAL
DRILLING PILOT PROJECT, RIO ARRIBA
COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by KLM Oil & Gas as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT
(name, address, phone
and contact person)

ATTORNEY

KLM Oil & Gas
5808 S. Rapp Street, Ste 102
Littleton, CO 80120
Attn: Dan Sommers
(714) 365-0100

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

STATEMENT OF CASE

APPLICANT

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

KLM Oil & Gas seeks approval for a high angle horizontal/directional drilling pilot project including special operating rules and a project allowable for a well to be drilled at a standard surface well location and dedicated to a 640-acre standard spacing unit.

KLM proposes that this project be subject to the Special Rules and Regulations that govern the West Puerto Chiquito Mancos Pool and that Section 33 be dedicated as the spacing unit for this project.

PROPOSED EVIDENCE

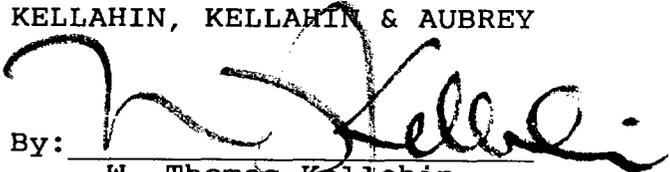
APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
Dan Sommer (Geologist)	15 Min.	Structure map Cross-section
Bob Fielder (Drilling Engineer)	20 Min.	Vertical drilling profile Plan view
Kemper Hipple (Landman)	10 Min.	Land plat

PROCEDURAL MATTERS

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

KELLAHIN, KELLAMIN & AUBREY

By: 

W. Thomas Kellahin

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PRE-HEARING STATEMENT

This pre-hearing statement is submitted by BENSON-MONTIN-GREER DRILLING CORP. as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

INTERESTED PARTY
(name, address, phone
and contact person)

ATTORNEY

Benson-Montin-Greer
Drilling Corp.
221 Petroleum Center Bldg.
Farmington, NM 87401
Attn: Albert R. Greer
(505) 325-8874

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

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STATEMENT OF CASE

INTERESTED PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

Benson-Montin-Greer Drilling Corp. is an interested operator in this area.

PROPOSED EVIDENCE

INTERESTED PARTY

WITNESSES
(name and expertise)

EST. TIME

EXHIBITS

None.

PROCEDURAL MATTERS

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

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin

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