

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

RECEIVED

AUG 17 1992

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

OIL CONSERVATION DIVISION

CASE NO. 10534

APPLICATION OF AMERICAN HUNTER  
EXPLORATION, LTD. FOR A PRESSURE  
MAINTENANCE PROJECT, RIO ARRIBA  
COUNTY, NEW MEXICO

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

APPLICANT  
(name, address, phone  
and contact person)

ATTORNEY

American Hunter  
Exploration, Ltd.

William F. Carr  
CAMPBELL, CARR, BERGE ET AL  
P.O. Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421

OPPOSITION OR OTHER 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  
P.O. Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285

Pre-hearing Statement  
NMOCD Case No. 10534  
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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.)

SEE APPLICANT FILING

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.)

Benson-Montin-Greer Drilling Corp. opposes the applicant's request in this case because the applicant seeks approval of a pressure maintenance project without forming a pressure maintenance unit containing the acreage affected by this project.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES  
(name and expertise)

EST. TIME

EXHIBITS

SEE APPLICANT FILING

OPPOSITION

WITNESSES  
(name and expertise)

EST. TIME

EXHIBITS

Unknown at this time.

**PROCEDURAL MATTERS**

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

None at this time.

KELLAHIN and KELLAHIN

By: 

W. Thomas Kellahin

P.O. Box 2265

Santa Fe, New Mexico 87504

(505) 982-4285

**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. 10534

APPLICATION OF AMERICAN HUNTER EXPLORATION, LTD.  
FOR A PRESSURE MAINTENANCE PROJECT,  
RIO ARRIBA COUNTY, NEW MEXICO.

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**PRE-HEARING STATEMENT**

OIL CONSERVATION DIVISION

This prehearing statement is submitted by William F. Carr, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

American Hunter Exploration, Ltd.  
c/o Jim Lister \_\_\_\_\_  
410 17th Street, Suite 1220 \_\_\_\_\_  
Denver, Colorado 80202 \_\_\_\_\_

(303) 825-5212 \_\_\_\_\_  
name, address, phone and  
contact person

**ATTORNEY**

William F. Carr \_\_\_\_\_  
Campbell, Carr, Berge & Sheridan \_\_\_\_\_  
Post Office Box 2208 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_

(505) 988-4421 \_\_\_\_\_

**OPPOSITION OR OTHER PARTY**

Benson-Montin-Greer Drilling Co.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

name, address, phone and  
contact person

**ATTORNEY**

W. Thomas Kellahin, Esq. \_\_\_\_\_  
Kellahin and Kellahin \_\_\_\_\_  
Post Office Box 2265 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_

(505) 982-4285 \_\_\_\_\_

**STATEMENT OF CASE**

APPLICANT

American Hunter Exploration, Ltd., Applicant, in the above-referenced cause, seeks authority to institute a pressure maintenance project on the West Puerto Chiquito-Mancos Oil Pool by the reinjection of gas into the Niobrara member of the Mancos shale through its existing Jicarilla 2-A Well No. 1, surface location 442 feet from the North line and 1177 feet from the East line (Unit A) of Section 2, Township 27 North, Range 1 West.

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**

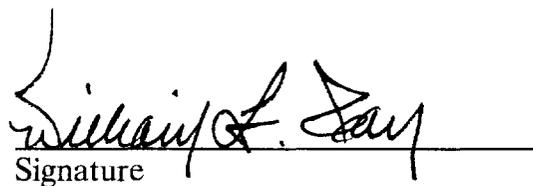
APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Jim Lister, Senior Exploration Geologist	15 Minutes	Approximately 4
Jim Artindale, Petroleum Engineer	25 Minutes	Approximately 4

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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**PROCEDURAL MATTERS**

  
Signature