

**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. 10538

APPLICATION OF AMERICAN HUNTER EXPLORATION, LTD.  
FOR AN UNORTHODOX OIL WELL LOCATION  
AND A NON-STANDARD OIL PRORATION UNIT,  
RIO ARRIBA COUNTY, NEW MEXICO.

RECEIVED

AUG 18 1992

OIL CONSERVATION DIVISION

**PRE-HEARING STATEMENT**

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 an exception to Rule 4 of the Special Rules and Regulations for the Gavilan-Mancos Oil Pool, as promulgated by Division Order No. R-7407, as amended, for a well to be drilled at an unorthodox oil well location 500 feet from the North line and 1450 feet from the East line (Unit B) of irregular Section 28, Township 27 North, Range 2 West, Undesignated Gavilan-Mancos Oil Pool, all of said Section 28 to be dedicated to said well forming a non-standard 430.56-acre oil spacing and proration unit for said pool.

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**

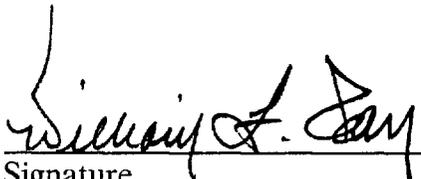
APPLICANT

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

OPPOSITION

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

  
\_\_\_\_\_  
Signature