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September 16, 1993

State of New Mexico
Energy, Minerals and Natural
Resources Department
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87501-2088

Attn: William J. Lemay, Director

Re: Application of Giant Exploration & Production Company for an Unorthodox Oil Well
Location, Santa Fe, County, New Mexico
Case No. 10811

Dear Mr. Lemay:

Enclosed please find Applicant's Pre-Hearing Statement in the above-referenced matter.

Sincerely,


Tommy Roberts

TR:mkc
Encl.

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. 10811

APPLICATION OF GIANT EXPLORATION
& PRODUCTION COMPANY FOR AN
UNORTHODOX OIL WELL LOCATION,
SANTA FE COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This prehearing statement is submitted by Giant Exploration & Production Company as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Giant Exploration & Production Co.

Tommy Roberts

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Farmington, New Mexico 87499

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Attn: Charles O. Foster

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OPPOSITION OR OTHER PARTY

ATTORNEY

Unknown

Unknown

STATEMENT OF CASE

APPLICANT

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

The Applicant seeks an order of the Oil Conservation Division approving an unorthodox oil well location 1,300 feet from the South line and 1,000 feet from the West line of Section 10, Township 20 North, Range 9 East, N.M.P.M., Santa Fe County, New Mexico, to test the Pennsylvanian formation. The SW/4SW/4 of Section 10 will be dedicated to the well. This application is based on geological, geophysical and topographical considerations.

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.)

NOT APPLICABLE

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Alan P. Emmendorfer - Petroleum Geologist	15-20 min.	- Land & Lease ownership map - Plat showing windows of Orthodox Locations - Drilling Activity Map - Topographic Map

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
NOT APPLICABLE		

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

NONE

Tommy Roberts

TOMMY ROBERTS, Attorney for
Giant Exploration & Production Company

DATED: September 16, 1993