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

Case No. 10,416

APPLICATION OF PRESIDIO EXPLORATION, INC. FOR INFILL DRILLING, SIMULTANEOUS DEDICATION, AND AN UNORTHODOX WELL LOCATION, EDDY COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Applicant as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT	ATTORNEY
VI I DI CVIII	ALIOMEL

Presidio Exploration, Inc.

3131 Turtle Creek Blvd.

Suite 400

Dallas, TX 75219

Attention: Marshall Munsell

(214) 528-5898

Albuquerque, N.M. 8710

(505) 768-1500

OPPOSITION OR OTHER PARTY ATTORNEY

Yates Petroleum Corporation William F. Carr

STATEMENT OF CASE

APPLICANT

Applicant operates 2 wells in Section 1-20 South-29 East, which are both completed in the East Burton Flat-Strawn Gas Pool (spaced on 320 acres). However, the wells are incapable of draining the entire section, leaving unrecovered reserves in the ground. Presidio wishes to drill an infill well in the NW¼ of Section 1, dedicate the N½ to the proposed well and its existing Superior Fed. No. 9 Well located in the NE¼ of Section 1, and produce both wells concurrently. The unorthodox location is requested in order to move the proposed well a sufficient distance from existing wells in the NE¼ and SW¼ of Section 1.

OPPOSITION OR OTHER PARTY

PROPOSED EVIDENCE

APPLICANT

	WITNESS	EST. TIME	EXHIBITS
(1)	Marshall Munsell (Landman)	10 minutes	(a) Land Plat(b) Notice lettersand Affidavit ofNotice
(2)	Al Fear (Geologist)	20 minutes	(a) Structure map(b) Porosity Isopach(c) Cross section(d) Production map
(3)	Chris Wolfarth (Engineer)	30 minutes	 (a) Charts and tabulations of pool production history (b) Bottom hole pressure study (c) Volumetric calculations (d) Decline curves
(4)	William Cobb (Engineer)	Potential Witn	ess
OPPO	SITION		

WITNESS EST. TIME EXHIBITS

PROCEDURAL MATTERS

Respectfully Submitted,

HINKLE, COX, EATON, COFFIELD &

HENSEEY

Tamor Bruce

500 Marquette, N.W.

Suite 800

Albuquerque, N.M. 87102

(505) 768-1500

Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was mailed to William F. Carr, P. O. Box 2208, Santa Fe, New Mexico 87504 this day of

December, 1991.

James Bruce

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(214) 528-5898

Minkle, Cox, Eaton,
Coffield & Hensley
500 Marquette, N.W.
Suite 800
Albuquerque, N.M. 87102
(505) 768-1500

OPPOSITION OR OTHER PARTY ATTORNEY

STATEMENT OF CASE

APPLICANT

Applicant operates 2 wells in Section 1-20 South-29 East, which are both completed in the East Burton Flat-Strawn Gas Pool (spaced on 320 acres). However, both wells have GOR's of less than 10,000:1, and are incapable of draining 320 acres. Presidio wishes to drill an infill well in the NW_4^1 of Section 1, dedicate the N_2^1 to the proposed well and its Superior Fed. No. 9 Well located in the NE_4^1 of Section 1, and produce both wells concurrently. The unorthodox location is requested in order to move the proposed well a sufficient distance from existing wells in the NE_4^1 and SW_4^1 of Section 1 to prevent drainage.

OPPOSITION OR OTHER PARTY

PROPOSED EVIDENCE

APPLICANT

	WITNESS	EST. TIME	EXHIBITS
(1)	Marshall Munsell (Landman)	10 minutes	(a) Land Plat(b) Notice lettersand Affidavit ofNotice
(2)	Al Fear (Geologist)	10 minutes	(a) Structure map(b) Porosity Isopach(c) Cross section(d) Production map
(3)	Chris Woolforth (Engineer)	20 minutes	(a) Drainage calculations
OPPOSITION			
	WITNESS	EST. TIME	EXHIBITS

PROCEDURAL MATTERS

Respectfully Submitted,

HINKLE, COX, EATON, COFFIELD & HENSLEY

James Bruce

500 Marquette, N.W.

Swite 800

Albuquerque, N.M. 87102 (505) 768-1500

Attorneys for Applicant

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

CASE NO. 10416

APPLICATION OF PRESIDIO EXPLORATION, INC. FOR AN UNORTHODOX GAS WELL LOCATION AND SIMULTANEOUS DEDICATION, EDDY COUNTY, NEW MEXICO.

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OIL CONSERVATION DIVISION

PRE-HEARING STATEMENT

This Prehearing Statement is submitted by Campbell, Carr, Berge & Sheridan, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT	ATTORNEY
Presidio Exploration, Inc	James G. Bruce, Esq500 Marquette NW, Suite 800 Albuquerque, NM 87102(505) 768-1500
name, address, phone and contact person	
OPPOSITION OR OTHER PARTY	ATTORNEY
Yates Petroleum Corporation	William F. Carr, Esq Campbell, Carr, Berge & Sheridan, P.A Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421
name, address, phone and contact person	

STATEMENT OF CASE

APPLICANT

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

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.)

Yates Petroleum Corporation opposes the application of Presidio Exploration, Inc. and requests that the application be denied.

PROPOSED EVIDENCE

APPLICANT

WITNESSES EST. TIME EXHIBITS (Name and expertise)

OPPOSITION

WITNESSES (Name and expertise)

EST. TIME EXHIBITS

(Name and expertise)

David Boneau, Petroleum Engineer 15 Min. Approximately 5

PROCEDURAL MATTERS

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

Signature

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

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OIL CONSERVATION DIVISION

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APPEARANCES OF PARTIES

ATTECHNICS

APPLICANT	ATTORNEY
Presidio Exploration, Inc	James G. Bruce, Esq 500 Marquette NW, Suite 800 Albuquerque, NM 87102 (505) 768-1500
name, address, phone and contact person	
OPPOSITION OR OTHER PARTY	ATTORNEY
Yates Petroleum Corporation	William F. Carr, Esq. Campbell, Carr, Berge & Sheridan, P.A Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421
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APPLICANT

WITNESSES (Name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES

EST. TIME

EXHIBITS

(Name and expertise)

David Boneau, Petroleum Engineer

15 Min.

Approximately 5

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Oil conservation division

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APPEARANCES OF PARTIES

APPLICANT	ATTORNEY
Presidio Exploration, Inc	James G. Bruce, Esq
name, address, phone and contact person	
OPPOSITION OR OTHER PARTY	ATTORNEY
Yates Petroleum Corporation c/o Randy Patterson 105 South Fourth Street Artesia, New Mexico 88210 (505) 748-1471	William F. Carr, Esq Campbell, Carr, Berge & Sheridan, P.A Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421
name, address, phone and	

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APPLICANT

WITNESSES (Name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES

EST. TIME

EXHIBITS

(Name and expertise)

David Boneau, Petroleum Engineer

15 Min.

Approximately 5

PROCEDURAL MATTERS

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

Signature