

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. 10285

APPLICATION OF AMERICAN HUNTER
EXPLORATION, LTD. FOR A HIGH ANGLE/
HORIZONTAL/DIRECTIONAL DRILLING
PILOT PROJECT, SPECIAL OPERATING
RULES THEREFOR, AND A NON-STANDARD
OIL PRORATION UNIT, 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.

RECEIVED

APPEARANCE OF PARTIES

APPLICANT
(name, address, phone
and contact person)

American Hunter
Exploration, Ltd.

ATTORNEY

William F. Carr
CAMPBELL & BLACK, P.A.
P.O. Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

OPPOSITION OR OTHER PARTY
(name, address, phone
and contact person)

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

ATTORNEY

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

APR 12 1991

OIL CONSERVATION DIV.
SANTA FE

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.)

Benson-Montin-Greer Drilling Corp. opposes the applicant's request in this case.

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES
(name and expertise)

EST. TIME

EXHIBITS

Unknown.

PROCEDURAL MATTERS

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

KELLAHIN, KELLAHIN & AUBREY

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. 10285

APPLICATION OF AMERICAN HUNTER
EXPLORATION, LTD. FOR A HIGH ANGLE/
HORIZONTAL/DIRECTIONAL DRILLING PILOT
PROJECT, SPECIAL OPERATING RULES
THEREFOR, AND A NON-STANDARD OIL
PRORATION UNIT, RIO ARRIBA, NEW MEXICO.

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APR 27 1991

OIL CONSERVATION DIVISION

PRE-HEARING STATEMENT

This Prehearing Statement is submitted by Campbell & Black, P.A., 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, Esq. _____
Campbell & Black, P.A. _____
Post Office Box 2208 _____
Santa Fe, New Mexico 87504 _____
(505) 988-4421 _____

OPPOSITION OR OTHER PARTY

Benson-Montin-Greer Drilling Corp.
221 Petroleum Center Building _____
Farmington, New Mexico 87401 _____

(505) 325-8874 _____

name, address, phone and
contact person

ATTORNEY

W. Thomas Kellahin _____
Kellahin, Kellahin & Aubrey _____
Post Office 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.)

American Hunter Exploration, Ltd., applicant in the above-captioned cause, seeks the formation of a 640-acre non-standard oil spacing and proration unit in the East Puerto Chiquito-Mancos Oil Pool comprising all of Section 8, Township 27 North, Range 1 East, for the purpose of initiating a high angle/horizontal directional drilling pilot project. Applicant proposes to commence its Jicarilla 8-I Well No. 1 to be located at a standard location 2000 feet from the South line and 500 feet from the East line (Unit I) of said Section 8, drill vertically to a depth of approximately 2300 feet, evaluate the pay zone, plug-back to an appropriate depth and kick-off in a westerly direction, build angle to approximately 80 degrees, and continue to drill a high angle hole in the Mancos formation for approximately 2,000 feet. Applicant further requests that special operating provisions be established for said project area including the designation of a prescribed area limiting the horizontal extent of said wellbore to a target window described as a rectangle 1250 to 2750 feet from the South line and 500 to 3000 feet from the East line of said Section 8. Also to be considered will be special allowable provisions for a quadruple sized oil proration unit for this 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
Ivan Kercher, Land	10 Min.	Approximately 4
James C. Lister, Geologist	10 Min.	Approximately 3
Jim Artindale, Reservoir Engineer	15 Min.	Approximately 4
Alex Bondarchuk, Drilling	10 Min.	Approximately 3

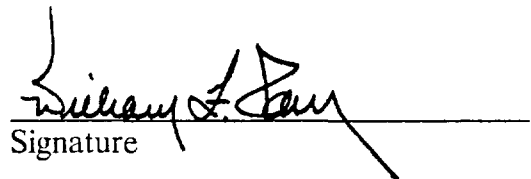
OPPOSITION

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

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

American Hunter Exploration, Ltd. has requested that the portion of this case concerning its Jicarilla 6A Well be continued for four weeks and will request that this case be consolidated with Cases 10286, 10300 and 10302.


Signature