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January 6, 1993

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ZARIN M RICHAPSONFRED W SO-WENDIMAN
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Florene Davidson Oil Conservation Division 310 Old Santa Fe Trail Santa Fe, New Mexico 87503

No. R-9390

0 6 1993 OIL CO**nservation Divis**ion

In the Matter of Case No. 10,100 Being Reopened Pursuant to the Provisions of Division Order

Dear Florene:

Please find attached the original and two copies of a Pre-Hearing Statement for filing on behalf of Energy Development Corporation in the above-referenced matter before the OCD. Thank you for your assistance with this matter.

Very truly yours,

HINKLE, COX, EATON, COFFIELD

& HENSLEY

Fran Sowers, Secretary

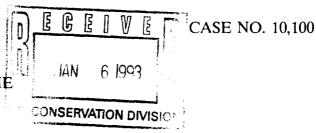
to/James Bruce

Enclosures

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:

IN THE MATTER OF CASE NO. 10,100 BEING REOPENED PURSUANT TO THE PROVISIONS OF DIVISION ORDER NO. R-9390.



PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Energy Development Corporation as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT ATTORNEY

Energy Development Corporation Suite 2900 1000 Louisiana Houston, Texas 77002 (713) 750-7300

Attention: Mark Blumenshine

James Bruce Hinkle, Cox, Eaton, Coffield & Hensley Post Office Box 2068 Santa Fe, New Mexico 87504-2068 (505) 982-4554

OPPOSITION OR OTHER PARTY ATTORNEY

Pre-Hearing Statement NMOCD Case No. 10,100 Page 2

STATEMENT OF CASE

APPLICANT

Energy Development Corporation is the successor operator of the San Isidro (Shallow) Unit in Sandoval County, and requests that the operating rules be made permanent because they are necessary to accommodate horizontal drilling.

OPPOSITION

PROPOSED EVIDENCE

APPLICANT

WITNESSES EST. TIME EXHIBITS

Marion Tebbs 10 minutes (a) Land Plat (Engineer) (b) Production Data

OPPOSITION

WITNESSES EST. TIME EXHIBITS

PROCEDURAL MATTERS

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD & HENSLEY

James Bruce

Post Office Box 2068 Santa Fe, New Mexico 87504-2068 (505) 982-4554

Attorneys for Energy Development Corporation

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:

Cases Nos: 10099 and 10100

APPLICATION OF SAMUEL GARY JR. & ASSOCIATES INC. FOR A HORIZONTAL DRILLING PILOT PROJECT, GAS REINJECTION/PRESSURE MAINTENANCE PROJECT AND SPECIAL RULES THEREFOR, SANDOVAL COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Applicant.

APPEARANCES OF PARTIES

APPLICANT ATTORNEY

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OPPOSITION OR OTHER PARTY ATTORNEY

-None-

STATEMENT OF CASE

APPLICANT

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

Applicant seeks to horizontally drill a well in the W_2 of Section 11, Township 20 North, Range 3 West, N.M.P.M. The well will be drilled to test the Mancos formation. Applicant also seeks aproval for a gas reinjection/pressure maintenance project in the San Isidro (Shallow) Unit Area, and also an administrative procedure to drill additional horizontal wells in the Unit.

Pre-hearing Statement NMOCD Case Nos. 10099 and 10100 Page 2

PROPOSED EVIDENCE

APPLICANT

WITNESS (Name and expertise)	EST. TIME	EXHIBITS
Craig Ambler (Landman)	(30 min.)	Land Plat Notice Documents
(Engineer)	(30 min.)	C-108 Well Schematics Structure map

PROCEDURAL MATTERS

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

The surface location of the test well may be changed. (The horizontal portions of the wellbore will not be changed).

Respectfully Submitted,

HINKLE, COX, EATON, COFFIELD & HENSLEY

James Bruce

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Attorneys for Applicant