

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:

APPLICATION OF PENNZOIL  
EXPLORATION AND PRODUCTION  
COMPANY FOR AN UNORTHODOX  
LOCATION, LEA COUNTY, NEW MEXICO

CASE NO. 10148

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by  
PENNZOIL EXPLORATION AND PRODUCTION COMPANY as required by  
the Oil Conservation Division.

**APPEARANCE OF PARTIES**

APPLICANT  
(name, address, phone  
and contact person)

ATTORNEY

Pennzoil Exploration &  
Production Company  
P.O. Box 2967  
Houston, Texas 77252  
Attn: Mr. Robert F. Blucher  
(713) 546-6193

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

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

ATTORNEY

**STATEMENT OF CASE**

APPLICANT

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

Applicant seeks approval of an unorthodox gas well location 1980 feet FNL and 990 feet FWL of Section 30, T19S, R34E for a well to be dedicated to the N/2 of said section and to be drilled at the unorthodox well location for geologic reasons. Applicant proposes to test for production from any 320 acre spaced gas pools including, but not limited to, the Quail Ridge Morrow Gas 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
Bill Hollingshead (geologist)	20 min.	geologic displays

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 the hearing)

KELLAHIN, KELLAHIN & AUBREY

By: 

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