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STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

OIL CONSERVATION DIV.
~~SANDSTONE~~

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

CASE NO. 10187

APPLICATION OF AVON ENERGY CORPORATION
FOR UNORTHODOX OIL WELL LOCATION AND
SIMULTANEOUS DEDICATION, EDDY COUNTY,
NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by AVON ENERGY CORPORATION as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT
(name, address, phone
and contact person)

ATTORNEY

Mr. T.M. Hatfield
BHI Energy Corporation
1153 Dairy Ashford, Ste. 803
Houston, Texas 77079
(713) 870-1178

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.)

Avon Energy Corporation seeks approval for an unorthodox oil well location for its Turner "B" Well No. 99 to be drilled 2600 feet from the South line and 50 feet from the East line (Unit I) of Section 30, T17S, R31E, Grayburg-Jackson Pool, Turner "B" Grayburg-Jackson Waterflood Project. Said well is to be simultaneous dedicated to an existing 40-acre oil spacing and proration unit comprising the NE/4SE/4 of said Section 30 to which is currently dedicated the Turner "B" Well No. 53 located at a standard oil well location 1980 feet from the South line and 660 feet from the East line (Unit I) of said Section 30.

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
Roy C. Williamson, Jr. (petroleum engineer)	30 min.	Grayburg Net Pay Isopach Map Vacuum Net Pay Isopach Map Top Grayburg - Structure Map Cross section A-A' (West-East) Cross section B-B' (West-East)

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: 

W. Thomas Kellahin

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