

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

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OIL CONSERVATION DIVISION

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

CASE NO. 10198

APPLICATION OF RICHMOND PETROLEUM INC.  
FOR A HORIZONTAL DIRECTIONAL DRILLING  
PILOT PROJECT, SPECIAL OPERATING RULES  
THEREFOR, AN UNORTHODOX OIL WELL  
LOCATION, AND A NON-STANDARD OIL  
PRORATION UNIT, RIO ARRIBA COUNTY,  
NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by RICHMOND  
PETROLEUM INC. as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

(name, address, phone  
and contact person)

Mr. Steve Roche  
Roche Oil and Gas Corp  
6400 Uptown Blvd., N.E.  
Suite 480W  
Albuquerque, NM 87110  
(505) 888-1799

ATTORNEY

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.)

Richmond Petroleum Inc. seeks authority to initiate a horizontal directional drilling pilot project in Irregular Section 28, T27N, R2W, being a non-standard 430.56-acre oil spacing and proration unit in the Undesignated Gavilan-Mancos Oil Pool. The applicant proposes to utilize its Jicarilla-Richmond JV Well NO. 28 to be drilled at an unorthodox well location 500 feet from the South and East lines to a depth of approximately 7100 feet, kick off in a northwesterly direction with a medium radius curve building angle to 90 degrees and penetrate the Gavilan-Mancos Oil Pool at an estimated depth of 7412 feet and thence drilling horizontally in a northwesterly direction a distance not in excess of 2,000 feet.

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
George Carlstrom (geologist)	15 Min.	-----
Steve Roche (landman)	10 Min.	-----
Sonny Pool (petroleum engineer)	15 Min.	-----

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

P.O. Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285

PAST 104.617

STATE OF NEW MEXICO  
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OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING  
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CONSIDERING:

**DRAFT**

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THEREFOR, AN UNORTHODOX OIL WELL  
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Steve Roche Landman	10 min	-
Sonny Pool P.E.	15 min	-

OPPOSITION

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
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