

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: 10210

APPLICATION OF SANTA FE ENERGY  
OPERATING PARTNERS, L.P. FOR  
AN UNORTHODOX OIL WELL LOCATION,  
EDDY COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Applicant as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Santa Fe Energy Operating  
Partners, L.P.  
550 West Texas, Suite 1330  
Midland, Texas 79701  
(915) 687-3551  
Attention: Larry Murphy

**ATTORNEY**

James Bruce  
Hinkle, Cox, Eaton,  
Coffield & Hensley  
500 Marquette, N.W.  
Suite 800  
Albuquerque, N.M. 87102  
(505) 768-1500

**OPPOSITION OR OTHER PARTY**

**ATTORNEY**

**STATEMENT OF CASE**

APPLICANT

Applicant seeks approval of an unorthodox oil well location in the S $\frac{1}{2}$ SE $\frac{1}{4}$  of Section 5, Township 18 South, Range 33 East, in Eddy County. The proposed location is based on topographic reasons.

OPPOSITION OR OTHER PARTY

Pre-hearing Statement

NMOCD Case No.

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PROPOSED EVIDENCE

APPLICANT

	WITNESS	EST. TIME	EXHIBITS
1.	Larry Murphy (Landman)	15 minutes	(a) Topographic map (b) Land plat (c) Notice Letter
2.	John Thoma (Geologist)	10 minutes	(a) Structure Map (b) Cross-section

OPPOSITION

WITNESS	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

Respectfully Submitted,

HINKLE, COX, EATON, COFFIELD &  
HENSLEY

By James Bruce  
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Attorneys for Applicant

# HINKLE, COX, EATON, COFFIELD & HENSLEY

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December 11, 1990

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## VIA FEDERAL EXPRESS

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10210

**RECEIVED**

DEC 12 1990

OIL CONSERVATION DIV.  
SANTA FE

Dear Florene:

Enclosed for filing are an original and two copies of each of the following Applications:

A. For Santa Fe Energy:

1. Application for Compulsory Pooling (S $\frac{1}{2}$  Section 17-24 South-25 East).
2. Application for Unorthodox Oil Well Location (~~S $\frac{1}{2}$ SE $\frac{1}{4}$~~  Section 5-18 South-33 East).
3. Application for Compulsory Pooling (W $\frac{1}{2}$ NW $\frac{1}{4}$  Section 8-18 South-33 East).

B. For Mewbourne Oil Company:

1. Application for Compulsory Pooling (E $\frac{1}{2}$  Section 29-20 South-27 East).
2. Application for Unorthodox Gas Well Location (N $\frac{1}{2}$  Section 14-17 South-26 East).

HINKLE, COX, EATON, COFFIELD & HENSLEY

Ms. Florene Davidson  
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C. For The Petroleum Corporation of Delaware:

1. Application for Compulsory Pooling (N $\frac{1}{2}$  Section 1-20 South-29 East).

Please set these cases for the January 10, 1991 Examiner Hearing. Thank you.

Very truly yours,

HINKLE, COX, EATON, COFFIELD &  
HENSLEY

  
By: James Bruce

JB:le  
Enclosures