

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. 10,415

APPLICATION OF SAMUEL GARY JR. &
ASSOCIATES, INC. FOR A HORIZONTAL
DIRECTIONAL DRILLING PILOT PROJECT,
ETC., SANDOVAL 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

Samuel Gary Jr. & Associates,
Inc.
1775 Sherman Street, Suite 1925
Denver, CO 80203
Attention: Craig Ambler
(303) 831-4673

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 requests approval of a horizontal directional drilling pilot project for a Mancos oil well, including a special gas:oil ratio. The surface location will be unorthodox, and the unit is non-standard due to variations in the U.S. Public Land Survey. There is an existing Mancos well on a portion of the proposed unit, and as a result simultaneous dedication is necessary.

OPPOSITION OR OTHER PARTY

PROPOSED EVIDENCE

APPLICANT

	WITNESS	EST. TIME	EXHIBITS
1.	Craig Ambler (Landman)	15 minutes	(a) Land plat (b) Notice letter and Affidavit of Notice
2.	_____ (Engineer)	15 minutes	(a) Drilling prognosis (b) Map of faulting in area

OPPOSITION

WITNESS	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

Respectfully Submitted,

HINKLE, COX, EATON, COFFIELD &
HENSLEY

By



James Bruce
500 Marquette, N.W.
Suite 800
Albuquerque, N.M. 87102
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(Attorneys for Applicant

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CASE NO. 10415

**APPLICATION OF SAMUEL GARY JR. AND
ASSOCIATES FOR HORIZONTAL
DRILLING PILOT PROJECT UNORTHODOX
OIL WELL LOCATION, EXCEPTION TO
GOR LIMITATION, NON-STANDARD
PRORATION UNIT AND SIMULTANEOUS
DEDICATION.**

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OIL CONSERVATION DIVISION

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Pre-Hearing Statement
Case No. 10415
Page 2

OPOSITION OR OTHER PARTY ATTORNEY

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

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

STATEMENT OF CASE

APPLICANT

SEE APPLICANT FILING

OPOSITION OR OTHER PARTY

Energy Development Corporation is working interest owner in the S/2N/2 of Section 4, T20N, R2W, NMPM.

Applicant has not yet proposed this well to Energy Development Corporation. No agreement has been reached with Energy Development Corporation concerning the subject well, or any other aspect of the applicant's request.

Energy Development Corporation is opposed to having this case heard prior to applicant proposing the well to the working interest parties and providing a reasonable time for evaluation and response.

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
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OPPOSITION

WITNESSES	EST. TIME	EXHIBITS
Mark Blumenshine Landman	15 minutes	estimated 4

PROCEDURAL MATTERS

None applicable at this time.

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin
P.O. Box 2265
Santa Fe, New Mexico 87504
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