CAMPBELL & BLACK, P.A.

LAWYERS

JACK M. CAMPBELL
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MICHAEL B. CAMPBELL
WILLIAM F. CARR
BRADFORD C. BERGE
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JEFFERSON PLACE
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POST OFFICE BOX 2208

SANTA FE, NEW MEXICO 87504-2208

TELEPHONE: (505) 988-4421
TELECOPIER: (505) 983-6043

August 4, 1989

RECEIVED

AUG 4 1989

HAND-DELIVERED

GIL CONSERVATION DIVISION

William J. LeMay, Director Oil Conservation Division New Mexico Department of Energy, Minerals and Natural Resources State Land Office Building Santa Fe, New Mexico 87503

Re: Oil Conservation Division Case No. 9715

Application of Benson-Montin-Greer Drilling Corporation for a Horizontal Directional Drilling Pilot Project, Special Operating Rules Therefor, and a Non-Standard Oil Proration Unit, West Puerto Chiquito-Mancos Oil Pool, Rio Arriba County, New Mexico

Dear Mr. LeMay:

Benson-Montin-Greer Drilling Corporation hereby requests that the above-referenced case scheduled for hearing before a Division Examiner on August 9, 1989 be continued to the Examiner hearings scheduled for August 23, 1989.

Your attention to this request is appreciated.

Very truly yours,

WILLIAM F. CARR

WFC:mlh

cc: Mr. Albert R. Greer

Kent Lund, Esq.

Mr. Craig Eggerman

A25.

CAMPBELL & BLACK, P.A.

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August 29, 1989

HAND-DELIVERED

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William J. LeMay, Director
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
State Land Office Building
Santa Fe, New Mexico 87503

AUG 29 182"

OIL CONSERVATION DIVISION

Re: Oil Conservation Division Case No. 9715
Application of Benson-Montin-Greer Drilling Corporation for a Horizontal Directional Drilling Pilot Project, Special Operating Rules Therefor, and a Non-Standard Oil Proration Unit, West Puerto Chiquito-Mancos Oil Pool, Rio Arriba County, New Mexico

Dear Mr. LeMay:

Benson-Montin-Greer Drilling Corporation hereby requests that the above-referenced case scheduled for hearing before a Division Examiner on September 6, 1989 be continued to the Examiner hearings scheduled for October 4, 1989.

Your attention to this request is appreciated.

Very truly yours,

WILLIAM F. CARR

WFC:mlh

cc: Mr. Albert R. Greer

Benson-Montin-Greer Drilling Corp. 221 Petroleum Center Building

Farmington, New Mexico 87401

Kent Lund, Esq. Amoco Production Company Post Office Box 800 Denver, Colorado 80201

Mr. Craig Eggerman Mobil Exploration & Producing U.S. Inc. Post Office Box 5444 Denver, Colorado 80217 CAMPBELL & BLACK, P.A.

LAWYERS

JACK M. CAMPBELL BRUCE D. BLACK MICHAEL B. CAMPBELL WILLIAM F. CARR BRADFORD C. BERGE MARK F. SHERIDAN J. SCOTT HALL JOHN H. BEMIS WILLIAM P. SLATTERY MARTE D. LIGHTSTONE PATRICIA A. MATTHEWS

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July 14, 1989

HAND-DELIVERED

Case 97/5

RECEIVED

JUL 14 1989

William J. LeMay, Director Oil Conservation Division New Mexico Department of Energy, Minerals and Natural Resources State Land Office Building Santa Fe, New Mexico 87503

OIL CONSERVATION DIVISION

In the Matter of the Application of Benson-Montin-Greer Drilling Corp. for the Drilling of a Horizontal Well and Special Provisions for Horizontally Drilled Wells Within a Portion of the Canada Ojitos Unit, West Puerto Chiquito-Mancos Oil Pool, Rio Arriba County, New Mexico

Dear Mr. LeMay:

Enclosed in triplicate is the above-referenced Application of Benson-Montin-Greer Drilling Corp. Benson-Montin-Greer Drilling Corp. respectfully requests that this matter be placed on the docket for the Examiner hearings scheduled on August 9, 1989.

Very truly yours,

WFC:mlh Enclosures

cc w/enclosures: Mr. Albert R. Greer

Benson-Montin-Greer Drilling Corp.

150' Fat off of the outer

BEFORE THE

OIL CONSERVATION DIVISION

DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

IN THE MATTER OF THE APPLICATION OF BENSON-MONTIN-GREER DRILLING CORP. FOR THE DRILLING OF A HORIZONTAL WELL AND SPECIAL PROVISIONS FOR HORIZONTALLY DRILLED WELLS WITHIN A PORTION OF THE CANADA OJITOS UNIT, WEST PUERTO CHIQUITO-MANCOS OIL POOL, RIO ARRIBA COUNTY, NEW MEXICO.

RECEIVED

JUL 14 1989

OIL CONSERVATION DIVISION

case no. 97/5

APPLICATION

BENSON-MONTIN-GREER DRILLING CORP., by and through its undersigned attorneys, hereby applies for approval of a horizontal directionally drilled well and for special provisions relating to such wells within a portion of the Canada Ojitos Unit, West Puerto Chiquito Oil Pool, Rio Arriba County, New Mexico, and in support thereof states:

- 1. Applicant is the operator and a working interest owner in Section 15 and 16, Township 25 North, Range 1 West, N.M.P.M., Rio Arriba County, New Mexico.
- 2. Said Section 15 and 16 are located in the Canada Ojitos Unit, West Puerto Chiquito-Mancos Oil Pool.
- 3. The special rules for the West Puerto Chiquito Oil Pool provide for 640-acres oil well spacing, and further provide that said pool is governed by the Special Rules for the West Puerto Chiquito-Mancos Oil Pool promulgated by Order R-2565-C as amended.

- 4. The COU 8 (A16) Well is located in the NE/4 of Section 16 and has all of Section 16 dedicated to it. Said well is currently producing from the Mancos formation, West Puerto Chiquito-Mancos Oil Pool.
- 5. Applicant seeks approval to reenter the COU 8 (A16) Well at a surface location 850 feet from the North line and 1030 feet from the East line in Section 16, Township 25 North, Range 1 West, N.M.P.M., and directionally drill horizontally through in the Mancos formation, in an easterly direction. The producing interval in the horizontal portion of the well bore will be located in both Sections 15 and 16.
- 6. Applicant seeks special provisions for Sections 15 and 16 within the West Puerto Chiquito-Mancos Oil Pool, for horizontal directionally drilled wells, including:
 - A. Permission to dedicate an unorthodox 1280 unit to one well. In particular, Sections 15 and 16 will be dedicated to the COU 8 (A16) Well.
 - B. Relief from the well location requirements of Rule 4(a) of the Special Rules for the West Puerto Chiquito-Mancos Oil Pool.
 - C. An oil well allowable based upon a 1280-acre unit.
- 7. Granting this application will be in the best interest of conservation, the prevention of waste and the protection of correlative rights.

WHEREFORE, Applicant requests that this matter be set for hearing on August 9, 1989 before a duly appointed Examiner of the Oil Conservation Division and, after notice and hearing as required by law, the Division enter its Order granting this application.

Respectfully submitted,

CAMPBELL & BLACK, P.A.

WILLIAM E CADD

Post Office Box 2208

Santa Fe, New Mexico 87504 Telephone: (505) 988-4421

ATTORNEYS FOR BENSON-MONTIN-GREER DRILLING CORP. Case _____

Application of Benson-Montin-Greer Drilling Corporation for a horizontal directional drilling pilot project and special operating rules therefore, West Puerto Chiquito-Mancos Oil Pool, Rio Arriba County, New Mexico. Applicant in the above styled cause, seeks authority to initiate a horizontal directional drilling well in Sections 15 and 16, Township 25 North, Range 1 West, West Puerto Chiquito-From its COU 8 (A16) Well Mancos Oil Pool. located on the surface 850 feet from the North line and 1030 feet from the East line of Section 16, Township 25 North, Range 1 West, the Applicant proposes to extend the wellbore horizontally to the East and dedicate all of Sections 15 and 16 in the West Puerto Chiquito Mancos Oil Pool to this well, forming an unorthodox 1280-acre oil proration unit in said Applicant further seeks special rules and provisions including the designation of a prescribed area limiting the horizontal extent wellbore and special allowable considerations.

8/09/89 Docket

William F. Carr Campbell & Black, P.A. Post Office Box 2208 Santa Fe, New Mexico 87504 Telephone: (505) 988-4421

BEFORE THE

OIL CONSERVATION DIVISION

DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

IN THE MATTER OF THE APPLICATION OF BENSON-MONTIN-GREER DRILLING CORP. FOR THE DRILLING OF A HORIZONTAL WELL AND SPECIAL PROVISIONS FOR HORIZONTALLY DRILLED WELLS WITHIN A PORTION OF THE CANADA OJITOS UNIT, WEST PUERTO CHIQUITO-MANCOS OIL POOL, RIO ARRIBA COUNTY, NEW MEXICO.

CASE NO. 97/5

APPLICATION

BENSON-MONTIN-GREER DRILLING CORP., by and through its undersigned attorneys, hereby applies for approval of a horizontal directionally drilled well and for special provisions relating to such wells within a portion of the Canada Ojitos Unit, West Puerto Chiquito Oil Pool, Rio Arriba County, New Mexico, and in support thereof states:

- 1. Applicant is the operator and a working interest owner in Section 15 and 16, Township 25 North, Range 1 West, N.M.P.M., Rio Arriba County, New Mexico.
- 2. Said Section 15 and 16 are located in the Canada Ojitos Unit, West Puerto Chiquito-Mancos Oil Pool.
- 3. The special rules for the West Puerto Chiquito Oil Pool provide for 640-acres oil well spacing, and further provide that said pool is governed by the Special Rules for the West Puerto Chiquito-Mancos Oil Pool promulgated by Order R-2565-C as amended.

- 4. The COU 8 (A16) Well is located in the NE/4 of Section 16 and has all of Section 16 dedicated to it. Said well is currently producing from the Mancos formation, West Puerto Chiquito-Mancos Oil Pool.
- 5. Applicant seeks approval to reenter the COU 8 (A16) Well at a surface location 850 feet from the North line and 1030 feet from the East line in Section 16, Township 25 North, Range 1 West, N.M.P.M., and directionally drill horizontally through in the Mancos formation, in an easterly direction. The producing interval in the horizontal portion of the well bore will be located in both Sections 15 and 16.
- 6. Applicant seeks special provisions for Sections 15 and 16 within the West Puerto Chiquito-Mancos Oil Pool, for horizontal directionally drilled wells, including:
 - A. Permission to dedicate an unorthodox 1280 unit to one well. In particular, Sections 15 and 16 will be dedicated to the COU 8 (A16) Well.
 - B. Relief from the well location requirements of Rule 4(a) of the Special Rules for the West Puerto Chiquito-Mancos Oil Pool.
 - C. An oil well allowable based upon a 1280-acre unit.
- 7. Granting this application will be in the best interest of conservation, the prevention of waste and the protection of correlative rights.

WHEREFORE, Applicant requests that this matter be set for hearing on August 9, 1989 before a duly appointed Examiner of the Oil Conservation Division and, after notice and hearing as required by law, the Division enter its Order granting this application.

Respectfully submitted,

CAMPBELL & BLACK, P.A.

WILLIAM F. CARR

Post Office Box 2208

Santa Fe, New Mexico 87504 Telephone: (505) 988-4421

ATTORNEYS FOR BENSON-MONTIN-GREER DRILLING CORP.