

**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. 10286

APPLICATION OF AMERICAN HUNTER  
EXPLORATION, LTD. FOR A HIGH ANGLE/  
HORIZONTAL/DIRECTIONAL DRILLING PILOT  
PROJECT, SPECIAL OPERATING RULES  
THEREFOR, TWO NON-STANDARD OIL  
PRORATION UNITS, AND TWO UNORTHODOX OIL  
WELL LOCATIONS, RIO ARRIBA, NEW MEXICO.

RECEIVED

APP 21 1991

OIL CONSERVATION DIVISION

**PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Campbell & Black, P.A., as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

American Hunter Exploration, Ltd.  
c/o Jim Lister \_\_\_\_\_  
410 17th Street, Suite 1220 \_\_\_\_\_  
Denver, Colorado 80202 \_\_\_\_\_  
(303) 825-5212 \_\_\_\_\_  
name, address, phone and  
contact person

**ATTORNEY**

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

**OPPOSITION OR OTHER PARTY**

Benson-Montin-Greer Drilling Corp.  
221 Petroleum Center Building \_\_\_\_\_  
Farmington, New Mexico 87401 \_\_\_\_\_  
\_\_\_\_\_  
(505) 325-8874 \_\_\_\_\_  
name, address, phone and  
contact person

**ATTORNEY**

W. Thomas Kellahin \_\_\_\_\_  
Kellahin, Kellahin & Aubrey \_\_\_\_\_  
Post Office Box 2265 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_  
(505) 982-4285 \_\_\_\_\_

## STATEMENT OF CASE

### APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

American Hunter Exploration, Ltd., applicant in the above-captioned cause, seeks authority to initiate a high angle/horizontal directional drilling pilot project in Sections 4 and 6, Township 27 North, Range 1 West, forming two non-standard oil spacing and proration units in the West Puerto Chiquito-Mancos Oil Pool comprising 651.76 acres and 620.97 acres, respectively. Within each proration unit, applicant proposes to commence from surface unorthodox oil well locations (Section 4: 330 feet from the North and East lines and Section 6: 450 feet from the North line and 400 feet from the East line), drill vertically to a depth of 7,500 feet, plug back to an appropriate depth and kick-off in a westerly direction, build angle to approximately 80 degrees, and continue to drill a high angle hole in the Mancos formation for approximately 2,000 feet. Applicant further requests that special operating provisions be established for said project area including the designation of a prescribed area limiting the horizontal extent of each wellbore in each proration unit to the following described target windows: Section 4: 330 to 1,830 feet from the North line and 330 to 2,830 feet from the East line; and Section 6: 330 to 1,950 feet from the North line and 400 to 2,900 feet from the East line.

### 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
Ivan Kercher, Land	10 Min.	Approximately 4
James C. Lister, Geologist	10 Min.	Approximately 3
Jim Artindale, Reservoir Engineer	15 Min.	Approximately 4
Alex Bondarchuk, Drilling	10 Min.	Approximately 3

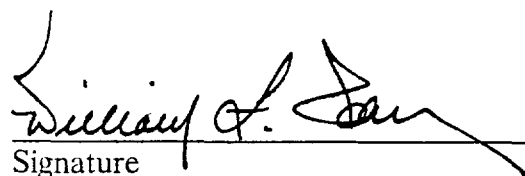
OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
-----------------------------------	-----------	----------

**PROCEDURAL MATTERS**

(Please identify any procedural matters which need to be resolved prior to hearing)

American Hunter Exploration, Ltd. has requested that the portion of this case concerning its Jicarilla 6A Well be continued for four weeks and will request that this case be consolidated with Cases 10285, 10300 and 10302.

  
Signature

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. 10286

APPLICATION OF AMERICAN HUNTER  
EXPLORATION, LTD. FOR A HIGH ANGLE/  
HORIZONTAL/DIRECTIONAL DRILLING  
PILOT PROJECT, SPECIAL OPERATING  
RULES THEREFOR, AND TWO NON-STANDARD  
OIL PRORATION UNITS, RIO ARRIBA COUNTY,  
NEW MEXICO

**RECEIVED**

APR 12 1991

OIL CONSERVATION DIV.  
SANTA FE

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by BENSON-MONTIN-GREER DRILLING CORP. as required by the Oil Conservation Division.

**APPEARANCE OF PARTIES**

APPLICANT  
(name, address, phone  
and contact person)

ATTORNEY

American Hunter  
Exploration, Ltd.

William F. Carr  
CAMPBELL & BLACK, P.A.  
P.O. Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421

OPPOSITION OR OTHER PARTY  
(name, address, phone  
and contact person)

ATTORNEY

Benson-Montin-Greer  
Drilling Corp.  
221 Petroleum Center Bldg.  
Farmington, NM 87401  
Attn: Albert R. Greer  
(505) 325-8874

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

**STATEMENT OF CASE**

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

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.)

Benson-Montin-Greer Drilling Corp. opposes the applicant's request in this case.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES  
(name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES  
(name and expertise)

EST. TIME

EXHIBITS

Unknown.

**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