

**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:

OCD
Rec.
10/29/94
FD

APPLICATION OF ENRE CORPORATION FOR
A HIGH ANGLE/HORIZONTAL DIRECTIONAL
DRILLING PROJECT, SPECIAL OPERATING
RULES THEREFOR, AND AN UNORTHODOX
OIL WELL LOCATION,
RIO ARRIBA COUNTY, NEW MEXICO.

No. 11128

PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

EnRe Corporation
c/o Jeff Kirn
621 17th Street, Suite 1535
Denver, CO 80293
(303) 296-7553
name, address, phone and
contact person

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

OTHER PARTY

ATTORNEY

name, address, phone and
contact person

STATEMENT OF CASE

APPLICANT

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

EnRe Corporation, applicant in the above-styled cause, seeks authority to institute a high angle/horizontal directional drilling project in the Mancos formation, West Puerto Chiquito-Mancos Pool underlying a project area comprised of all of Section 15, Township 27 North, Range 1 West. Applicant proposes to drill its Los Indios Canyon 15 N Well No. 1 from an unorthodox surface location 1295 feet from the South line and 1360 feet from the West line (Unit N) of said Section 15, directionally drill in an easterly direction to reach the Mancos formation at a true vertical depth of approximately 6921 feet and then drill horizontally until approximately 2600 feet of lateral distance is attained. Applicant further seeks the adoption of special operating provisions and rules within the project area including the designation of a target window for the horizontal portion of the wellbore such that the horizontal or producing portion of the wellbore shall be no closer than 330 feet from the outer boundary of the project area.

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

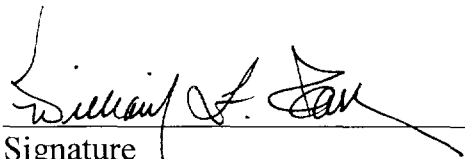
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Jeff Kim, Geologist	15 Min.	Approximately 6

OTHER PARTY

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

PROCEDURAL MATTERS

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


Signature