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W. THOMAS KELLAHIN*

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July 19, 1996

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Mr. David R. Catanach
Hearing Examiner
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

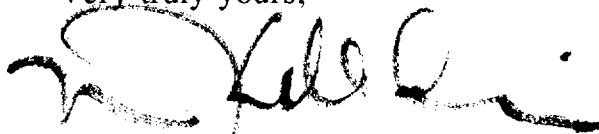
Oil Conservation Division

Re: **MOTION FOR CONTINUANCE
AND REQUEST FOR PRODUCTION**
NMOCD Case 11577
Application of Amerada Hess Corporation
for an unorthodox oil well location,
Lea County, New Mexico

Dear Mr. Catanach:

On behalf of Tamarack Petroleum Company, Inc., an adversely affected offset operator, please find enclosed our **Motion for Continuance and Request for Production** in the referenced case current set for hearing on the July 25, 1996 Division Examiner's docket.

Very truly yours,



W. Thomas Kellahin

cc: *via facsimile to:*
William F. Carr, Esq.
Attorney for applicant
cc: *Tamarack Petroleum Company, Inc.*
Attn: Alan Earp

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

**IN THE MATTER OF THE APPLICATION OF
AMERADA HESS CORPORATION FOR
AN UNORTHODOX OIL WELL LOCATION,
LEA COUNTY, NEW MEXICO**

CASE NO. 11577

**MOTION FOR CONTINUANCE
AND
REQUEST FOR PRODUCTION**

Comes now TAMARACK PETROLEUM COMPANY, INC. ("Tamarack"), by its attorneys, Kellahin and Kellahin, and moves the Division to continue this case until the August 8, 1996 Examiner's docket and to require Amerada Hess on or before July 25, 1996 to deliver to counsel for Tamarack a complete set of any and all exhibits Amerada Hess may introduce at hearing;

and in support thereof states:

- (1) On July 16, 1996, Tamarack filed its entry of appearance in opposition to the applicant in this case.
- (2) Amerada Hess seeks an unorthodox oil well location which if approved will encroach upon acreage controlled by Tamarack.
- (3) On July 18, 1996, Larry Angle of Amerada Hess advised Alan Earp of Tamarack that because of Tamarack's opposition, Mr. Angle was recommending that Amerada Hess moves its location back to a standard oil well location.

(4) On July 19, 1996, Mr. Angle called Mr. Earp to advise that Amerada Hess would not accept Mr. Angle's recommendation and that they intended to go forward with the hearing on July 25, 1996.

(5) Hal Gill and Bob Liem, Tamarack's expert witnesses in this case, are both unavailable to testify on July 25, 1996.

(6) Tamarack is unable to adequately prepare for hearing without having a reasonable opportunity prior to hearing in which to review and examine any exhibits which applicant may introduce at hearing.

(7) Concurrence of opposing counsel has been requested.



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CERTIFICATE OF SERVICE

I certify that a copy of this pleading was transmitted by facsimile to counsel for applicant this 19th day of July, 1996.


W. Thomas Kellahin

**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. 11577

APPLICATION OF AMERADA HESS CORPORATION
FOR AN UNORTHODOX GAS WELL LOCATION,
LEA COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by TAMARACK PETROLEUM COMPANY, INC. as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

Amerada Hess Corporation

ATTORNEY

William F. Carr, Esq.
P. O. Box 2208
Santa Fe, New Mexico 87504
(505) 9884421

OPPONENT

Tamarack Petroleum Company, Inc.
500 West Texas, Suite 1485
Midland, Texas 79701-4264
Attn: Alan Earp
(915) 683-5474

ATTORNEY

W. Thomas Kellahin
KELLAHIN AND KELLAHIN
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Santa Fe, NM 87504
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STATEMENT OF CASE

APPLICANT

Tamarack Petroleum Company, Inc. is the offsetting operator towards whom Amerada Hess seeks Division authority to drill its Vinson Well No. 1 at an unorthodox oil well location 210 feet FSL and 2520 FEL of Section 4, T20S, R38E to be dedicated to a 40-acre spacing unit consisting of the SE/4SW/4 of said Section 4.

Tamarack objects to this unorthodox because its approval will adversely affect Tamarack's correlative rights.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

Hall Gill (not available on July 25, 1996)


Bob Liem (not available on July 25, 1996)

PROCEDURAL MATTERS

Tamarack has filed a Motion for Continuance and for Production of Exhibits which is pending a decision by the Examiner.

None at this time.

KELLAHIN AND KELLAHIN

By: 

W. Thomas Kellahin

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