M 3-31-99

## 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:

APPLICATION OF KCS MEDALLION RESOURCES, INC. FOR SIMULTANEOUS DEDICATION AND AN UNORTHODOX GAS WELL LOCATION, EDDY COUNTY, NEW MEXICO.

Case No. 12,144

## PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

#### **APPEARANCES**

#### APPLICANT

# APPLICANT'S ATTORNEY

KCS Medallion
Resources, Inc.
Suite 700
7130 South Lewis Avenue
Tulsa, Oklahoma 74136
Attention: D.R. Deffenbaugh
(918) 491-4105

James Bruce P.O. Box 1056 Santa Fe, New Mexico 87504 (505) 982-2043

OPPONENT

OPPONENT'S ATTORNEY

#### STATEMENT OF THE CASE

#### APPLICANT

Applicant seeks to drill a well in the W% §27-18S-31E, at an unorthodox location 1202 feet FNL and 660 feet FWL of Section 27, to test the Morrow formation. The well is unorthodox due to geologic and topographic reasons. The W% of Section 27 is dedicated to an existing Morrow well. The additional well is required to produce all reserves under the well unit.

### **OPPONENT**

# PROPOSED EVIDENCE

# APPLICANT

WITNESSES	EST. TIME	EXHIBITS
W.R. Siruta (geologist)	15 min.	<ul> <li>(a) land plat</li> <li>(b) notice affidavit</li> <li>(c) production map</li> <li>(d) isopachs</li> <li>(e) cross-section</li> <li>(f) topography plat</li> </ul>
Wes VanNatta (engineer)	15 min.	<ul> <li>(a) r e s e r v e calculations</li> <li>(b) d r a i n a g e calculations</li> <li>(c) production data</li> </ul>

## OPPONENT

WITNESSES

EST. TIME

EXHIBITS

# PROCEDURAL MATTERS

-None-

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