

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. 10284

APPLICATION OF AMERICAN HUNTER  
EXPLORATION, LTD. FOR AN UNORTHODOX  
WELL LOCATION, RIO ARriba COUNTY,  
NEW MEXICO

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

**RECEIVED**

APPLICANT  
(name, address, phone  
and contact person)

ATTORNEY

APR 12 1991

OIL CONSERVATION DIV.  
SANTA FE

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

Pre-hearing Statement  
NMOCD Case No. 10284  
Page 2

## 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