

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

**RECEIVED**

IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
DIVISION FOR THE PURPOSE OF  
CONSIDERING:

JUL 05 1991

OIL CONSERVATION DIV.  
SANTA FE

CASE NO. 10348

APPLICATION OF KLM OIL & GAS FOR  
A HIGH ANGLE/HORIZONTAL DIRECTIONAL  
DRILLING PILOT PROJECT, RIO ARRIBA  
COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by KLM Oil & Gas as required by the Oil Conservation Division.

**APPEARANCE OF PARTIES**

APPLICANT  
(name, address, phone  
and contact person)

ATTORNEY

KLM Oil & Gas  
5808 S. Rapp Street, Ste 102  
Littleton, CO 80120  
Attn: Dan Sommers  
(714) 365-0100

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.)

KLM Oil & Gas seeks approval for a high angle horizontal/directional drilling pilot project including special operating rules and a project allowable for a well to be drilled at a standard surface well location and dedicated to a 640-acre standard spacing unit.

KLM proposes that this project be subject to the Special Rules and Regulations that govern the West Puerto Chiquito Mancos Pool and that Section 33 be dedicated as the spacing unit for this project.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
Dan Sommer (Geologist)	15 Min.	Structure map Cross-section
Bob Fielder (Drilling Engineer)	20 Min.	Vertical drilling profile Plan view
Kemper Hipple (Landman)	10 Min.	Land plat

**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

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OIL CONSERVATION DIVISION

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

INTERESTED 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**

INTERESTED 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. is an interested operator in this area.

**PROPOSED EVIDENCE**

INTERESTED PARTY

WITNESSES  
(name and expertise)

EST. TIME

EXHIBITS

None.

**PROCEDURAL MATTERS**

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

KELLAHIN, KELLAHIN & AUBREY

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