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. 10808

APPLICATION OF KINLAW OIL CORPORATION FOR A HIGH ANGLE/HORIZONTAL DIRECTIONAL DRILLING PILOT PROJECT AND SPECIAL OPERATING RULES THEREFORE, LEA COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This prehearing statement is submitted by William F. Carr, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Kinlaw Oil Corporation 3301 Northland, Suite 102 Austin, Texas 78731 Attn: Mike Hill

(512) 454-4736

name, address, phone and contact person

OPPOSITION OR OTHER PARTY

name, address, phone and contact person

ATTORNEY

William F. Carr Campbell, Carr, Berge & Sheridan Post Office Box 2208 Santa Fe, New Mexico 87504

(505) 988-4421_____

ATTORNEY

Pre-hearing Statement NMOCD Case No. 10808 Page 2

STATEMENT OF CASE

APPLICANT

Kinlaw Oil Corporation, applicant, seeks to initiate a horizontal drilling project in the Devonian formation, Denton-Devonian Pool underlying the SE/4 SW/4 of Section 36, Township 15 South, Range 37 East. Applicant proposes to re-enter its Shell Oil Company State "SDA" Well No. 2 which is at an orthodox location 660 feet from the South line and 1650 feet from the West lines (Unit N) of said Section 36, kick-off from vertical in a southwesterly direction commencing to build angle at an appropriate rate to vertically and horizontally traverse the proposed producing area. Applicant further seeks the adoption of special operating provisions and rules within the project area including the designation of a target window such that the horizontal or producing portion of the wellbore shall be no closer than 330 feet to any boundary of the proration unit, and for a special project allowable.

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.)

Pre-hearing Statement NMOCD Case No. 10808 Page 3

PROPOSED EVIDENCE

<u>APPLICANT</u>

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Mike Hill, Geologist	15 Min.	Approximately 4
Dave Phillips, Petroleum Engineer	10 Min.	Approximately 2

OPPOSITION

WITNESSES (Name and expertise) EST. TIME

EXHIBITS

PROCEDURAL MATTERS

Kinlaw will request that this case be consolidated for the purpose of hearing with Cases 10807 and 10809.

illian f. Earl