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OIL CONSERVATION DIVISION  
RECEIVED

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Farmington, N.M. 87499

September 16, 1993

State of New Mexico  
Energy, Minerals and Natural  
Resources Department  
New Mexico Oil Conservation Division  
P.O. Box 2088  
Santa Fe, NM 87501-2088

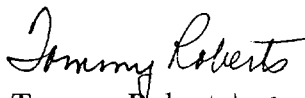
Attn: William J. Lemay, Director

Re: Application of Giant Exploration & Production Company for an Unorthodox Oil Well  
Location, Santa Fe, County, New Mexico  
Case No. 10811

Dear Mr. Lemay:

Enclosed please find Applicant's Pre-Hearing Statement in the above-referenced matter.

Sincerely,

  
Tommy Roberts

TR:mkc  
Encl.

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. 10811

APPLICATION OF GIANT EXPLORATION  
& PRODUCTION COMPANY FOR AN  
UNORTHODOX OIL WELL LOCATION,  
SANTA FE COUNTY, NEW MEXICO.

**PRE-HEARING STATEMENT**

This prehearing statement is submitted by Giant Exploration & Production Company  
as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Giant Exploration & Production Co.

P.O. Box 2810

Farmington, New Mexico 87499

Attn: Charles O. Foster

505/326-3325

ATTORNEY

Tommy Roberts

P.O. Box 1020

Farmington, New Mexico 87499

505/325-1801

OPPOSITION OR OTHER PARTY

Unknown

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\_\_\_\_\_

ATTORNEY

Unknown

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STATEMENT OF CASE

APPLICANT

(Please make a concise statement of what is being sought with the application and the reasons therefore.)

The Applicant seeks an order of the Oil Conservation Division approving an unorthodox oil well location 1,300 feet from the South line and 1,000 feet from the West line of Section 10, Township 20 North, Range 9 East, N.M.P.M., Santa Fe County, New Mexico, to test the Pennsylvanian formation. The SW/4SW/4 of Section 10 will be dedicated to the well. This application is based on geological, geophysical and topographical considerations.

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.)

NOT APPLICABLE

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Alan P. Emmendorfer - Petroleum Geologist	15-20 min.	- Land & Lease ownership map - Plat showing windows of Orthodox Locations - Drilling Activity Map - Topographic Map

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
NOT APPLICABLE		

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

NONE



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TOMMY ROBERTS, Attorney for  
Giant Exploration & Production Company

DATED: September 16, 1993