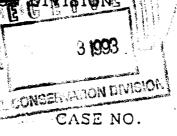
# STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPAREMENT OIL CONSERVATION DIVISIONS

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

contact person



10819

APPLICATION OF Petroleum Development Company for a short-radius horizontal direction drilling project area and special operating rules therefor, Roosevelt County, New Mexico.

# PRE-HEARING STATEMENT

This prehearing statement is submitted by <u>Petroleum Development Corporation</u> as required by the Oil Conservation Division.

# APPEARANCES OF PARTIES

APPLICANT	ATTORNEY
Petroleum Development Corporation	Walter Kegel
9720-B Candelaria NE	P.O. Box 2073
Albuquerque, New Mexico	Espanola, NM 87532
	1-800-933-2214
Jim C. Johnson	
name, address, phone and contact person	
OPPOSITION OR OTHER PARTY	ATTORNEY
name, address, phone and	

.-hearing Statement .MOCD Case No. 10819 Page 2

### STATEMENT OF CASE

## APPLICANT

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

Reenter each of the listed wellbores mill a 60'+ - section in the exisiting 5.5" casing. Set a cement plug drilled to a predetermined kick-off point. Kick-off from vertical, build angle with a 60' to 80'+ - short radius arc to approximately 90' into the San Andres Pay Zone. Continue to drill horizontally 800' to 1400' into the Pay Zone maintaining a distance of 100' from any 1EASE LINE BCUNDARIES. Reason for this procedure is to attempt to economically recover 0il & Gas reserves from these leases that have not been recovered from the conventional vertical wellbores.

Case 10818: Strange Federal #1,2,3

Case 10819: Mountain Federal #4,5

Case 10820: Wattam Federal #1

Case 10821: Wattam Federal #2,6

# 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. 10819 Page 3

## PROPOSED EVIDENCE

# APPLICANT

WITNESSES EST. TIME EXHIBITS (Name and expertise) J. C. Johnson 30 min. (4)Petroleum Engineer 35 years Oil & Gas Exploration and Production from Canada to Gulf Coast. Five Years Experience in Short Radius Horizontal

## OPPOSITION

Drilling.

WITNESSES EST. TIME EXHIBITS (Name and expertise)

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

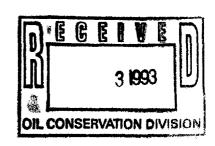
Considerable time could be saved by consolidating cases nos. 10818, 10820 and 10821 as testimony will be identical.

# 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. 10819** 

APPLICATION OF PETROLEUM DEVELOPMENT COMPANY FOR A SHORT-RADIUS HORIZONTAL DIRECTIONAL DRILLING PROJECT AREA AND SPECIAL OPERATING RULES THEREFORE, ROOSEVELT COUNTY, NEW MEXICO.



## **PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Campbell, Carr, Berge & Sheridan, P.A., as required by the Oil Conservation Division.

#### APPEARANCES OF PARTIES

APPLICANT	ATTORNEY
Petroleum Development Company	Walter R. Kegel, Esq Kegel Law Firm, P.C.
	Post Office Box 2073
	Espanola, NM 87532-2073
	(505) 753-7633
name, address, phone and contact person	
OPPOSITION OR OTHER PARTY	ATTORNEY
Yates Petroleum Corporation	William F. Carr, Esq.
c/o David Boneau	Campbell, Carr, Berge & Sheridan, P.A.
105 South Fourth Street	Post Office Box 2208
Artesia, New Mexico 88210	Santa Fe, New Mexico 87504
(505) 748-1471	(505) 988-4421
name, address, phone and	
contact person	

Pre-hearing Statement NMOCD Case No. 10819 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.)

Yates Petroleum Corporation does not oppose the applications of Petroleum Development Company for approval of horizontal drilling pilot projects.

Since the procedures to be followed by operators in obtaining approval of horizontal drilling projects continue to evolve, Yates, as an offset operator to Petroleum Development Company, will present comments on matters to be considered i establishing administrative procedures for approval of horizontal wells.

Pre-hearing Statement NMOCD Case No. 10819 Page 3

## PROPOSED EVIDENCE

# **APPLICANT**

WITNESSES (Name and expertise)

EST. TIME

**EXHIBITS** 

## **OPPOSITION**

WITNESSES

EST. TIME

**EXHIBITS** 

(Name and expertise)

David Boneau, Petroleum Engineer

10 Min.

Approximately 1

## PROCEDURAL MATTERS

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

Signature