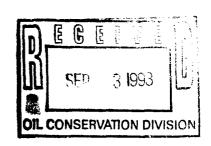
STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

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

CASE NO. 10821

APPLICATION OF PETROLEUM DEVELOPMENT COMPANY FOR A SHORT-RADIUS HORIZONTAL DIRECTIONAL DRILLING PROJECT AREA AND SPECIAL OPERATING RULES THEREFORE, CHAVES 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. 10821 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. 10821 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

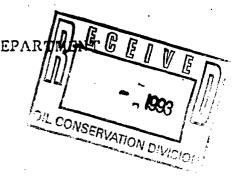
(Please identify any procedural matters which need to be resolved prior to hearing)

Signature

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTOR OIL CONSERVATION DIVISION

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

contact person



CASE NO.

10821

APPLICATION OF Petroleum Development Company for a short-radius horizontal directional drilling project area and special operating rules therefor, Chaves 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. 10821 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 BOUNDARIES. 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-hea	ring	State	ment
NMOCD	Case	No.	
Page 3			

10821

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 Drilling.

OPPOSITION

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 case nos. 10818, 10819 and 10820 as testimony will be identical.

Signature

BEFORE THE

OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

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

CASE NO. 10821

ENTRY OF APPEARANCE

COMES NOW CAMPBELL, CARR, BERGE & SHERIDAN, P.A., and hereby enters its appearance in the above referenced case on behalf of Yates Petroleum Corporation.

Respectfully submitted,

CAMPBELL, CARR, BERGE & SHERIDAN, P.A.,

В

DIL CONSERVATION DIVISIO

2 1993

WILLIAM F. CARR

Post Office Box 2208

Santa Fe, New Mexico 87504

Telephone: (505) 988-4421

ATTORNEYS FOR YATES PETROLEUM CORPORATION

CERTIFICATE OF MAILING

I hereby certify that on this 2 day of September, 1993, I have caused to be mailed a copy of our Entry of Appearance in the above-captioned case to:

C. E. Johnson, President Petroleum Development Company 9720-B Candelaria, NE Albuquerque, NM 87112

William F. Carr