

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:

APPLICATION OF PENNZOIL CASE NO. 10148
EXPLORATION AND PRODUCTION
COMPANY FOR AN UNORTHODOX
LOCATION, LEA COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by
PENNZOIL EXPLORATION AND PRODUCTION COMPANY as required by
the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT
(name, address, phone
and contact person)

ATTORNEY

Pennzoil Exploration &
Production Company
P.O. Box 2967
Houston, Texas 77252
Attn: Mr. Robert F. Blucher
(713) 546-6193

W. Thomas Kellahin
KELLAHIN, KELLAHIN & AUBREY
P.O. Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285

OPPOSITION OR OTHER PARTY
(name, address, phone
and contact person)

ATTORNEY

STATEMENT OF CASE

APPLICANT

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

Applicant seeks approval of an unorthodox gas well location 1980 feet FNL and 990 feet FWL of Section 30, T19S, R34E for a well to be dedicated to the N/2 of said section and to be drilled at the unorthodox well location for geologic reasons. Applicant proposes to test for production from any 320 acre spaced gas pools including, but not limited to, the Quail Ridge Morrow Gas Pool.

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)

PROPOSED EVIDENCE

APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
Bill Hollingshead (geologist)	20 min.	geologic displays


OPPOSITION

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

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

KELLAHIN, KELLAHIN & AUBREY

By: 
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