

**RECEIVED**

DEC 14 1990

STATE OF NEW MEXICO OIL CONSERVATION DIV.  
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. 10185\

APPLICATION OF AVON ENERGY CORPORATION  
FOR UNORTHODOX OIL WELL LOCATION AND  
SIMULTANEOUS DEDICATION, EDDY COUNTY,  
NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by AVON ENERGY CORPORATION as required by the Oil Conservation Division.

**APPEARANCE OF PARTIES**

APPLICANT  
(name, address, phone  
and contact person)

Mr. T.M. Hatfield  
BHI Energy Corporation  
1153 Dairy Ashford, Ste. 803  
Houston, Texas 77079  
(713) 870-1178

ATTORNEY

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

Pre-hearing Statement  
NMOCD Case No. 10185  
Page 2

#### STATEMENT OF CASE

##### APPLICANT

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

Avon Energy Corporation seeks approval for an unorthodox oil well location for its Fren Well No. 37 to be drilled 100 feet from the South and East lines (Unit P) of Section 19, T17S, R31E, Grayburg-Jackson Pool, Atlantic Grayburg Jackson Friess-Fren Waterflood Project. Said well is to be simultaneous dedicated to an existing 40-acre oil spacing and proration unit comprising the SE/4SE/4 of said Section 19 to which is currently dedicated the Fren Oil Co. Well No. 10 located at a standard oil well location 990 feet from the South line and 330 feet from the East line (Unit P) of said Section 19.

##### 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<br>(name and expertise)              | EST. TIME | EXHIBITS  |
|--|-----------|---|
| Roy C. Williamson, Jr.<br>(petroleum engineer) | 30 min.   | Grayburg Net Pay<br>Isopach Map<br>Vacuum Net Pay<br>Isopach Map<br>Top Grayburg -<br>Structure Map<br>Cross section A-A'<br>(West-East)<br>Cross section B-B'<br>(West-East) |

OPPOSITION

| WITNESSES<br>(name and expertise) | EST. TIME | EXHIBITS |
|-----------------------------------|-----------|----------|
|-----------------------------------|-----------|----------|

**PROCEDURAL MATTERS**

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

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin

P.O. Box 2265

Santa Fe, New Mexico 87504

(505) 982-4285