CAMPBELL & BLACK, P.A.

LAWYERS

JACK M. CAMPBELL BRUCE D. BLACK MICHAEL B. CAMPBELL WILLIAM F. CARR BRADFORD C. BERGE MARK F. SHERIDAN WILLIAM P. SLATTERY ANNIE-LAURIE COOGAN

JEFFERSON PLACE SUITE I - 110 NORTH GUADALUPE POST OFFICE BOX 2208 SANTA FE, NEW MEXICO 87504-2208 TELEPHONE: (505) 988-4421 TELECOPIER: (505) 983-6043

April 8, 1991

HAND-DELIVERED

Case /0300 APP + 1991 Oil CONSERVATION DIVISION

William J. LeMay, Director Oil Conservation Division New Mexico Department of Energy, Minerals and Natural Resources State Land Office Building Santa Fe, New Mexico 87503

> Re: In the Matter of the Application of American Hunter Exploration, Ltd. for Horizontal Drilling, a Non-Standard Spacing Unit, and Special Allowable, Rio Arriba County, New Mexico

Dear Mr. LeMay:

Enclosed in triplicate is the Application of American Hunter Exploration, Ltd. in the above-referenced case. American Hunter Exploration, Ltd. respectfully requests that this matter be placed on the docket for the May 2, 1991 Examiner hearings.

Very truly yours,

WILLIAM F. CARR

WFC:mlh Enclosures cc w/enc.:

Mr. Jim Lister American Hunter Exploration, Ltd. 410 17th Street, Suite 1220 Denver, Colorado 80202 CAMPBELL & BLACK, P.A.

JACK M. CAMPBELL BRUCE D. BLACK MICHAEL B. CAMPBELL WILLIAM F. CARR BRADFORD C. BERGE MARK F. SHERIDAN WILLIAM P. SLATTERY ANNIE-LAURIE COOGAN JEFFERSON PLACE SUITE I - IIO NORTH GUADALUPE POST OFFICE BOX 2208 SANTA FE, NEW MEXICO 87504-2208 TELEPHONE: (505) 988-4421 TELECOPIER: (505) 983-6043

HAND-DELIVERED

William J. LeMay, Director Oil Conservation Division New Mexico Department of Energy, Minerals and Natural Resources State Land Office Building Santa Fe, New Mexico 87503

- 227-

Re: Oil Conservation Division Cases 10285, 10286 10300 and 10302 Applications of American Hunter Exploration, Ltd. for High Angle/Horizontal/Directional Drilling Pilot Projects, Special Operating Rules Therefor, Non-Standard Oil Proration Units, and Unorthodox Oil Well Locations, Rio Arriba County, New Mexico

April 26, 1991

Dear Mr. LeMay:

American Hunter Exploration, Ltd., hereby requests that each of the above-referenced cases currently scheduled for hearing on May 2, 1991 be continued to the Examiner hearings scheduled for May 30, 1991.

Your attention to this matter is appreciated.

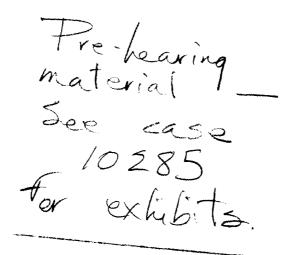
Vqry truly yours,

william V.

WILLIAM F. CARR

WFC:mlh

cc: Bureau of Indian Affairs Bureau of Land Management Mr. James C. Lister Mr. Albert R. Greer



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:

C,	CASE NO. 10300	
APPLICATION OF AMERICAN HUNTER	RECEIVED	* ***
EXPLORATION, LTD. FOR A HIGH ANGLE/	ACC 07 1601	
HORIZONTAL/DIRECTIONAL DRILING PILOT	APR 2 0 1991	
PROJECT, SPECIAL OPERATING RULES	- THATION DUVISION	
THEREFOR, AND A NON-STANDARD OIL	OIL CONSERVATION DIVISION	
PRORATION UNIT, RIO ARRIBA, NEW MEXICO.	ι - - Γ	•
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PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

American Hunter Exploration, Ltd. c/o Jim Lister______ 410 17th Street, Suite 1220_____

Denver, Colorado 80202_____

(303) 825-5212_____

name, address, phone and contact person

OPPOSITION OR OTHER PARTY

Benson-Montin-Greer Drilling Corp. 221 Petroleum Center Building____ Farmington, New Mexico 87401___

(505) 325-8874 name, address, phone and contact person

ATTORNEY

William F. Carr, Esq
Campbell & Black, P.A.
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

ATTORNEY

W. Thomas Kellahin_____ Kellahin, Kellahin & Aubrey_____ Post Office Box 2265_____ Santa Fe, New Mexico 87504_____ (505) 982-4285______ Pre-hearing Statement NMOCD Case No. 10300 Page 2

STATEMENT OF CASE

APPLICANT

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

American Hunter Exploration, Ltd., applicant in the above-captioned cause, seeks the formation of a 640-acre non-standard oil spacing and proration unit in the East Puerto Chiquito-Mancos Oil Pool comprising all of Section 6, Township 27 North, Range 1 East, for the purpose of initiating a high angle/horizontal directional drilling pilot project. Applicant proposes to commence its Jicarilla 6-A Well No. 1 to be located at a standard oil well location 660 feet from the North line and 700 feet from the East line (Unit A) of said Section 6, drill vertically to a depth of approximately 2,850 feet, evaluate the pay zone, plug-back to an appropriate depth and kick-off in a westerly direction, build angle to approximately 2,000 feet. Applicant further requests that special operating provisions be established for said project area including the designation of a prescribed area limiting the horizontal extent of said wellbore to a target window described as a rectangle 330 feet to 2,160 feet from the North line and 700 to 3,200 feet from the East line of said Section 6. Also to be considered will be special allowable provisions for a quadruple sized oil proration unit for this 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.)

Pre-hearing Statement NMOCD Case No. 10300 Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Ivan Kercher, Land	10 Min.	Approximately 4
James C. Lister, Geologist	10 Min.	Approximately 3
Jim Artindale, Reservoir Engineer	15 Min.	Approximately 4
Alex Bondarchuk, Drilling	10 Min.	Approximately 3

OPPOSITION

WITNESSES (Name and expertise) EST. TIME

EXHIBITS

PROCEDURAL MATTERS

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

American Hunter Exploration, Ltd. will request that this case be consolidated with Cases 10285, 10286 and 10302.

ing A. Ear

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING GOVERNOR

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICO 87504 (505) 827-5800

June 28, 1991

CAMBELL & BLACK Attorneys at Law P. O. Box 2208 Santa Fe, New Mexico 87504

RE: CASE NO. 10285, 10286, 10300, 10302, 10309 ORDER NO. R-9535, R-9536, R-9537, R-9538, R-9539

Dear Sir:

Enclosed herewith are two copies of the above-referenced Division order recently entered in the subject case.

Sincerely,

Florene Clavidson

Florene Davidson OC Staff Specialist

FD/sl

cc: BLM Farmington Office Tom Kellahin OCD Aztec Office