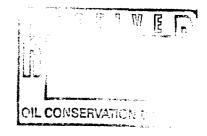
STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

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

APPLICATION OF SANTA FE ENERGY RESOURCES, INC. FOR APPROVAL OF A UNIT AGREEMENT, LEA COUNTY, NEW MEXICO.

CASE NO. 11,383



PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Applicant as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

ATTORNEY

Santa Fe Energy Resources, Inc. James Bruce 550 West Texas, Suite 1330 Midland, Texas 79701 (915) 686-6172 Post Office Box 2068

Attn: Danita Walker

OPPOSITION OR OTHER PARTY

Hinkle, Cox, Eaton, Coffield & Hensley, P.L.L.C., Ltd., Co. Santa Fe, New Mexico 87504-2068

(505) 982-4554

ATTORNEY

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STATEMENT OF CASE

APPLICANT

Applicant requests approval of the Kemosabe Unit, an exploratory unit covering state land. Applicant proposes to drill a well to test the Bone Spring formation. Unitization will ensure orderly development of the prospective reservoirs in this area.

OPPOSITION

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
Danita Walker (Landman)	10 minutes	 (a) Land Plat (b) Unit Agreement (c) Land Commissioner preliminary approval
		(d) Operating Agreement (e) AFE
Mike Dilli (Geologist)	10 minutes	<pre>(a) Cross-section (b) Isopach</pre>
OPPOSITION		
WITNESSES	EST. TIME	EXHIBITS

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PROCEDURAL MATTERS

The advertisement for the case omitted the word "Energy" from applicant's name, and it also misdescribed the acreage in Township 18 South, Range 34 East as Section 18 rather than Section 13. Thus, the case needs to be readvertised. In addition, the proposed unit boundaries have been contracted to include only the NE¼ and S½ of Section 13, Township 18 South, Range 34 East, and Lots 1-4 and the E½W½ of Section 18, Township 18 South, Range 35 East, containing 792.64 acres.

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD & HENSLEY, P.L.L.C., Ltd., Co.

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James Bruce Post Office Box 2068 Santa Fe, New Mexico 87504-2068 (505) 982-4554

Attorneys for Santa Fe Energy Resources, Inc.

kemosabe.phs