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

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

CASE NO. 10775

IN THE MATTER OF THE APPLICATION OF SANTA FE ENERGY OPERATING PARTNERS, L.P., FOR AN UNORTHODOX INFILL GAS WELL LOCATION AND SIMULTANEOUS DEDICATION, EDDY 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
Santa Fe Energy Operating Partners, L.P	James G. Bruce, Esq. Hinkle, Cox, Eaton, Coffield & Hensley Post Office Box 2068 Santa Fe, New Mexico 87504
	(505) 982-4554
name, address, phone and contact person	
OPPOSITION OR OTHER PARTY	ATTORNEY
Enron Oil & Gas Company	William F. Carr, Esq
c/o Pat Tower	Campbell, Carr, Berge & Sheridan, P.A.
Post Office Box 2267	Post Office Box 2208
Midland, TX 79702	(505) 988-4421
(915) 686-3758	(505) 988-4421
name, address, phone and	
contact person	

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.)

Enron Oil & Gas Company will appear in opposition to this application and present testimony in support of the imposition of a production penalty on the Santa Fe well.

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Pat Tower, Landman	5 Min.	Approximately 2
Barry Zinz, Geologist	15 Min.	Approximately 3
Randy Cate, Petroleum Engineer	15 Min.	Approximately 3

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 DEPARTMENT OIL CONSERVATION DIVISION

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

CASE NO. 10,775

APPLICATION OF SANTA FE ENERGY OPERATING PARTNERS, L.P. FOR AN UNORTHODOX INFILL GAS WELL LOCATION AND SIMULTANEOUS DEDICATION, EDDY COUNTY, NEW MEXICO.



PRE-HEARING STATEMENT

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

APPEARANCE OF PARTIES

APPLICANT

Santa Fe Energy Operating Partners, L.P. Suite 1330 500 West Texas Midland, Texas 79701 Attention: Curtis Smith (915) 686-6631

OPPOSITION OR OTHER PARTY

Enron Oil & Gas Company

ATTORNEY

James Bruce
Hinkle, Cox, Eaton, Coffield
& Hensley
Post Office Box 2068
Santa Fe, New Mexico 87504-2068
(505) 982-4554

ATTORNEY

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

STATEMENT OF CASE

APPLICANT

The S½ of Section 1 is dedicated to applicant's Malaga 1 Fed. No. 1 Well, located in the SW¼ of Section 1 - 24 South - 28 East, which is producing from the Atoka formation. Applicant seeks to drill its Malaga 1 Fed. No. 2 Well to test the Atoka formation at an unorthodox location (1980 feet FSL and 660 feet FEL) in Section 1, and to simultaneously dedicate the well to the S½ of Section 1 together with its existing Malaga 1 Fed. No. 1 Well. The No. 2 Well will test a different Atoka sand than the No. 1 Well, and thus applicant requests authority to produce both wells concurrently. The unorthodox location for the No. 2 Well is necessary to insure that the separate Atoka sand will be adequately tested.

OPPOSITION

Enron operates the $N\frac{1}{2}$ of Section 1, and also an Atoka well in the $E\frac{1}{2}$ of Section 36 - 23 South - 28 East.

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS	
Curtis Smith (Landman)	5 minutes	(a) Land plat(b) Notice letters(c) AFE	
Louis Goldstein (Geologist)	20 minutes	(a) Structure map(b) Isopach(c) Cross-section)
(Engineer)	Possible witness		

OPPOSITION

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD & HENSLEY

James Bruce

Post Office Box 2068

Santa Fe, New Mexico 87504-2068

(505) 982-4554

Attorneys for Santa Fe Energy Operating Partners, L.P.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Pre-Hearing Statement was mailed to William F. Carr, Esq., Campbell, Carr, Berge & Sheridan, P.A., Post Office Box 2208, Santa Fe, New Mexico 87504-2208, this 200 day of September, 1993, by first-class mail, postage prepaid.

James Bruce

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

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Santa Fe Energy Operating Partners, L.P ()	James G. Bruce, Esq. Hinkle, Cox, Eaton, Coffield & Hens Post Office Box 2068 Santa Fe, New Mexico 87504 (505) 982-4554	
name, address, phone and contact person		
OPPOSITION OR OTHER PARTY	ATTORNEY	
Texaco Exploration & Production Inc.	William F. Carr, Esq Campbell, Carr, Berge & Sheridan, P.A. Post Office Box 2208 (505) 988-4421	
name, address, phone and contact person		

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.)

Texaco Exploration and Production, Inc. will appear in opposition to this application and present testimony in support of the imposition of a production penalty on the Santa Fe well.

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Allen Spelman, Geologist	15 Min.	Approximately 7
Jim Dore, Petroleum Engineer	10 Min.	Approximately 5

PROCEDURAL MATTERS

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Signature

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name, address, phone and contact person	. *	
OPPOSITION OR OTHER PARTY	ATTORNEY	
Enron Oil & Gas Company	William F. Carr, Esq. Campbell, Carr, Berge & Sheridan, P.A. Post Office Box 2208 (505) 988-4421 (505) 988-4421	

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APPLICANT

WITNESSES EST. TIME EXHIBITS (Name and expertise)

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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Signature