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	BUREAU OF LAND	MANAGEMEN	1T			Expires: March 31, 1993
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SUNDRY NOTICES AND REPORTS ON WELLS Do not use this form for proposals to drill or to deepen or reentry to a different reservoir.					S	F-078877
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Merrion Oil	l & Gas Corporation	(14634)		O1.()		anyon Largo Unit 12
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610 Reilly Ave	nue, Farmington, NM 8740	1-2634		5) 327-9801		d and Pool, or Exploratory Area
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			Recompletion		F	New Construction
s	Subsequent Report		Plugging Back			Non-Routine Fracturing
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Describe Proposed or o	completed Operations (Clearly state all pert ocations and measured and true vertical dep	inent details, and give p	pertinent dates, inclu	iding estimated date of star	rting any propos	ed work. If well is directionally drille
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Thereby certify that the	foregoing is true and correct					
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(This space for Federal	3 1					
Approved By	o. otate otateo usej	T(x) -				12/
Conditions of approval,	if any:	Title			Date	12/17/01
18 U.S.C. Section 1001,	, makes it a crime for any person knowin	gly and willfully to m	ake to any departm	ient or agency of the Unit	ted States any f	alse, fictitious or fraudulent statemer
presentations as to any n	natter within its jurisdiction,					, or maddient statemen
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MERRION

OIL & GAS

August 23, 2000

Mr. Richard Dembowski Bureau of Land Management 1235 La Plata Highway Farmington, NM 87401

RE: T&A'd_Well Status CLU 119, 126, 315, 356 Rio Arriba County, New Mexico

Dear Mr. Dembowski:

In followup to your letter dated July 12, 2000 and our subsequent meeting on August 23, 2000, this letter discusses Merrion's plans for using the subject (and other) wells in the Canyon Largo Unit Gallup PA for a waterflood. Specifically, Merrion requests that the subject wells (and other wells in the future, if necessary) be allowed to remain temporarily abandoned (or shut in if that is the case) for the near future. The following arguments are presented to support our request.

- 1. Enclosed is a report of a reservoir simulation study performed to evaluate the potential for a waterflood in the Canyon Largo Unit Gallup Formation. The report indicates that a waterflood is technically feasible, but economically marginal at the \$18 oil price assumed in the economics. While oil prices are currently well above \$18/bbl, the futures strip shows prices returning to near that level within two years. Merrion must have confidence that prices will be sustained above \$25/bbl before we would implement a waterflood pilot.
- 2. The waterflood will be extremely capital intensive and will require the use of all existing wellbores combined with additional infill drilling. Even at higher prices, we may not be able to justify the waterflood if we don't have the existing wellbores to use.
- 3. Again, the waterflood will require infilling the field on 80 acre or perhaps 40 acre spacing. Because of the current Resource Management Plan review (RMP), we couldn't do the waterflood right now anyway, even if we wanted to.
- 4. If the existing wells are allowed to be left in place, that would leave their surface locations available if needed during the RMP review period to be used to drill to other formations.
- 5. While Merrion is not ready to implement a waterflood now, or even in the next two years, we think the time will come in the next ten years to install that flood. That, however, may never happen if we are forced to plug out the existing wells. Therefore, the long-term interests of the mineral owners (which is mostly Federal in the Unit) are best served by not forcing Merrion to abandon these locations.

Below is a list of wells in the Canyon Largo Unit Gallup PA that ultimately may be used in the waterflood. We request that, should any of these existing producing wells require it, they be given similar consideration as the four subject wells.

Please call me with any questions at 505-325-9801 ext. 114. Thank you for your consideration.

Sincerely,

George Shárpe

Manager, Oil & Gas Investments

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File:s/invest/gfs/2000correspondence/clu ta letter

POTENTIAL WELLS FOR GALLUP WATERFLOOD <u>CANYON LARGO UNIT</u>

CLU #s 89, 128, 119, 126, 130R, 131R, 300, 301, 302, 303, 304, 305, 306, 307, 308, 310, 311, 313, 314, 315, 316, 317, 319, 321, 324, 326, 327, 328, 331, 332, 333, 335, 337, 338, 339, 340, 341, 342, 343, 344, 345, 356, 357, 358, 359, 393.