NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION 2040 South Pacheco Street Santa Fe, New Mexico 87505 (505) 827-7131

January 2, 1998

Merrion Oil & Gas Corporation 610 Reilly Avenue Farmington, New Mexico 87401 Attention: George F. Sharpe DECEIVED N JAN 1 2 1993 OIL CON. DIV. DIST. 3

Administrative Order NSL-3925

Dear Mr. Sharpe:

Reference is made to your application dated December 9, 1997 for an off-pattern non-standard Basin-Fruitland coal gas well location for your existing Nelson "A" Well No. 1 (API No. 30-045-05953), located 1980 feet from the North line and 1978 feet from the West line (Unit F) of Section 9, Township 26 North, Range 12 West, NMPM, San Juan County, New Mexico, which was drilled in 1957 and completed in the Gallegos-Gallup Associated Pool at a standard oil well location for a standard 80-acre oil spacing and proration unit for said interval comprising the E/2 NW/4 of said Section 9.

It is our understanding at this time that the Gallup interval is to be plugged back and recompleted up-hole into the Basin-Fruitland Coal (Gas) Pool, which pursuant to the "Special Rules and Regulations for the Basin-Fruitland Coal (Gas) Pool," as promulgated by Division Order No. R-8768, as amended, is unorthodox. Further, the N/2 of said Section 9 is to be dedicated to the well to form a standard 320-acre gas spacing and proration unit for said pool.

By the authority granted me under the provisions of Rule 8 of said special pool rules, the above-described unorthodox coal gas well location for the Nelson "A" Well No. 1 is hereby approved.

Sincerely,

Kathleen A. Garland Acting Director

KAG/MES/kv

cc: Oil Conservation Division - Aztec

U. S. Bureau of Land Management - Farmington

MERRION

OIL & GAS



December 17, 1997

Mr. William J. Lemay, Director New Mexico Oil Conservation Division 2040 S. Pacheco Santa Fe, New Mexico 87505

Re: REVISED

Application for Administrative Approval Non-Standard Location Nelson A-1 Basin Fruitland Coal Pool N/2 Section 9, T26N, R12W San Juan County, New Mexico

Dear Mr. Lemay:

Merrion Oil & Gas Corporation plans to recomplete the subject well from the Gallup Formation into the Fruitland Coal Formation. Merrion submitted an application for a non-standard location dated December 9, 1997 which was in error. This revised application replaces the original submittal.

The well's location of 1980' FNL and 1978' FWL is at a non-standard setback from the spacing unit boundary. In addition, the well is located in the NW/4 instead of the standard NE/4 outlined in the Basin Fruitland Coal Pool Rules. Therefore, Merrion requests your approval of a non-standard location.

The justification for the request is based on the ability to recomplete the existing well instead of drilling a new well. The well is uneconomic in the Gallup Formation and, unless recompleted, needs to be plugged out. The proposed recompletion would put the wellbore to beneficial use and save significant money over drilling a new well.

Attached in support of this application are the following:

1.) C-102 Plat

Page Two December 17, 1997

- 2.) Location plat showing offset operators.
- 3.) List of offset operators that received a certified copy of this application.

Please call me with any questions.

Sincerely,

George F. Sharpe

Manager - Oil & Gas Investments

xc: Frank Chavez - OCD, Aztec√

BLM - Farmington

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Charica I PO 3ax 1980, Hobbs, NM 2241-1980 District II \$11 South First, Artesia, NM 2210 District III 1000 Rie Brams Rd., Anec, NM 87410

2040 South Pacheco, Santa Fe, NM 87505

District IV



Forin C-102 Revised Cotober 13, 1994 Instructions on back Submit to Appropriate District Office

OIL CONSERVATION DIVISION 2040 South Pacheco Santa Fe, NM 87505

State Lease - 4 Copies Fee Lease - 3 Copies

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

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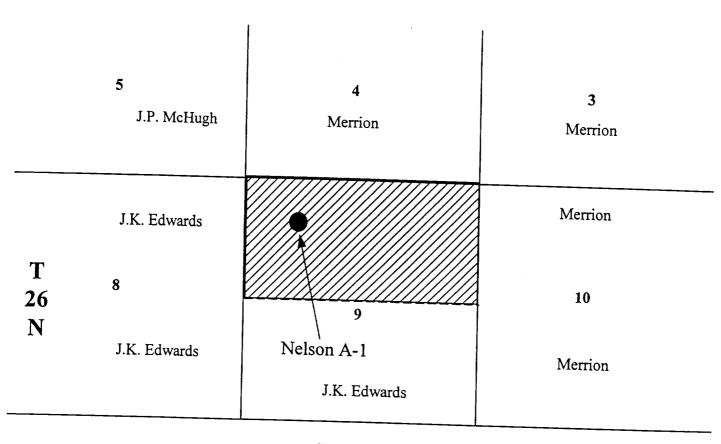
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EXHIBIT II NELSON A-1 WELL LOCATION PLAT OFFSET OPERATOR PLAT T26N, R12W, San Juan County, NM



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Exhibit III

Application of Merrion Oil & Gas Corp.
Non-standard Basin Fruitland Coal Location
Nelson A-1 Well
N/2 Section 9, T26N, R12W
San Juan County, New Mexico

The following offset operators received certified copies of this letter.

To: Offset Operators

Any objections to this application need to be made in writing to the NMOCD within 20 days from receipt of notice.

J K Edwards Associates, Inc. 1401 17th Street, Suite 1400 Denver, CO 80202

J P McHugh 650 S. Cherry Street, Suite 1225 Denver, CO 80222

WAIVER

| Company | hereby waives any objection to this application. |
|-----------|--|
| Signature | Date |
| | |

Please return to:

George F. Sharpe Merrion Oil & Gas Corporation 610 Reilly Ave. Farmington, NM 87401