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. 11135

APPLICATION OF MERIDIAN OIL INC. FOR DOWNHOLE COMMINGLING, SAN JUAN COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by MERIDIAN OIL INC. as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

MERIDIAN OIL INC. P. O. Box 4289 Farmington, N.M. 87499 Attn: Alan Alexander (505) 326-9757 **ATTORNEY**

W. Thomas Kellahin KELLAHIN AND KELLAHIN P.O. Box 2265 Santa Fe, NM 87504 (505) 982-4285

STATEMENT OF CASE

APPLICANT:

Meridian Oil Inc. seeks approval to downhole commingle conventional gas production from the Aztec-Pictured Cliffs Gas Pool with coal gas production from the Basin-Fruitland Coal Gas Pool within the wellbore of its existing WOOD WELL NO. 2 which is a Pictured Cliffs well at a standard gas well location for both pools, San Juan County, New Mexico. As set forth in its application, Meridian will establish, among other things, that:

- (1) Ownership is not identical within the spacing unit. However correlative rights will not be impaired because any remaining PC production will have to be abandoned unless commingled with the coal-gas and the allocation formula allows all parties to have their equitable and appropriate share of the respective production.
- (2) That in this instance, Pictured Cliffs production is so low that Meridian cannot economically continue to produced it unless it is downhole commingled with the coal-gas;
 - (3) No reservoir damage will occur;
- (4) Approval will allow the economic recovery of gas which might otherwise be left in the reservoirs thereby preventing waste.

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PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
Jay Close (geologist)	10 min.	2
Dean Price (landman)	10 min.	4
Leonard Biemer (petroleum engineer)	10 min.	2

PROCEDURAL MATTERS

NONE.

KELLAHIN AND KELLAHIN

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