ROBERTS & STROTHER, P. C.

TOMMY ROBERTS
ROBEN D. STROTHER

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April 9, 1998

New Mexico Oil Conservation Division P.O. Box 6429 Santa Fe, New Mexico 87505-6429

Attn: Lori Wrotenbery

Re: Applications of Merrion Oil & Gas Corporation

Case Nos. 11962 and 11963

Dear Ms. Wrotenbery:

Enclosed please find an original and two copies of Applicant's Pre-Hearing Statement for each of the above referenced matters.

Sincerely,

Tommy Roberts

Tommy Roberts

TR:nk Enclosures

cc w/enc: George Sharpe/Merrion Oil & Gas Corporation

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. 11962

APPLICATION OF MERRION OIL & GAS CORPORATION FOR COMPULSORY POOLING AND A NON-STANDARD GAS WELL LOCATION, SAN JUAN COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This prehearing statement is submitted by Merrion Oil & Gas Corporation as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT	ATTORNEY
Merrion Oil & Gas Corporation	Tommy Roberts
610 Reilly Avenue	P.O. Box 129
Farmington, New Mexico 87401	Farmington, New Mexico 87499
Attn: George Sharpe	505/325-6810
505/327-9801	
OPPOSITION OR OTHER PARTY	ATTORNEY
Numerous unleased mineral interest owners	Not Known
and uncommitted working interest owners.	
Applicant is not aware of any interested	
party who intends to appear at the hearing.	

Pre-Hearing Statement NMOCD Case No. 11962 Page 2

STATEMENT OF CASE

APPLICANT

(Please make a concise statement of what is being sought with the application and the reasons therefore.)

Applicant seeks an order pooling all mineral interests in the West Kutz-Pictured Cliffs Pool underlying the SW/4 of Section 15. Township 29 North, Range 13 West, forming a standard 160 acre gas spacing and proration unit for the pool. The unit is to be dedicated to the existing Farmington "C" Com No. 1 well located at an unorthodox gas well location 1625 feet from the South line and 1250 feet from the West line (Unit L) of Section 15. Also to be considered will be the cost of recompleting the well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of Applicant as operator of the well and a charge for risk involved in recompleting the well.

The application has been filed because Applicant has been unable to obtain the voluntary joinder of numerous owners of unleased mineral interests and uncommitted working interests underlying the lands within the proposed spacing and proration unit.

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.)

NOT APPLICABLE TO APPLICANT'S STATEMENT

Pre-Hearing Statement NMOCD Case No. 11962 Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)

EST. TIME

EXHIBITS

George F. Sharpe
- Petroleum Engineer

30 minutes

- Area Map

- Well Location Plat

- Lease Ownership Summarv

- Correspondence

 Authority for Expenditure
 Operating Agreement
 Survey of Drilling/ Producing Rates
 Production Map

- Topographic Map
- Evidence of Notice

OPPOSITION

WITNESSES (Name and expertise)

EST. TIME

EXHIBITS

NOT APPLICABLE

Pre-Hearing Statement NMOCD Case No. 11962 Page 4

PROCEDURAL MATTERS

(Please identify any procedural matters which need to be resolved prior to the hearing)

NONE

TOMMY ROBERTS. Attorney for Merrion Oil & Gas Corporation

DATED: April 9, 1998