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:

CASES NOS. 10745 and 10754

APPLICATION OF MERIDIAN OIL INC. TO AMEND ORDER R-9920 AND TO REOPEN CASES 10754 AND 10745, SAN JUAN AND RIO ARRIBA COUNTIES, 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 Pre-Hearing Statement Cases Nos. 10745 & 10754 Page 2

STATEMENT OF CASE

APPLICANT:

Meridian Oil Inc. requests an amendment to Order R-9920 such that the economic criteria for downhole commingling is based initially upon the relationship of costs to rate and estimated ultimate gas recovery only from the Pictured Cliffs pool. In addition, Meridian seeks to have this same criteria adopted in any order issued for cases 10754 and 10745.

Meridian proposed the following language:

"In the event total gas production from the Pictured Cliffs pool in a well exceeds both a maximum average daily producing rate of 300 MCFD and an estimated ultimate gas recovery (EUR) of 800 MMCF, then and in that event, downhole commingling will not be allowed in the affected well until either (a) both the rate and the EUR for the Pictured Cliffs pool drop below the above described limits, or (b) Meridian Oil Inc. submits evidence to the Aztec District Office of the Division that pursuant to Division Rule 303 (including cost to rate and EUR criteria) the Basin Fruitland Coal Gas Pool production qualifies the well for downhole commingling with the Pictured Cliffs pool."

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PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME EXHIBITS

Scott Daves (PE)

30-40 Min.

10

Possible additional witnesses:

Jim Craddock (PE) Mike Dawson (geologist) Alan Alexander (landman)

PROCEDURAL MATTERS

NONE.

KELLAHIN AND KELLAHIN

W. Thomas Kellahin

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