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:

FFR 1 1 1991

APPLICATION OF MERIDIAN OIL INC. FOR CASE NO. 10918 DOWNHOLE COMMINGLING, SAN JUAN COUNTY, NEW MEXICO

APPLICATION OF MERIDIAN OIL INC. CASE NO. 10919
FOR AN UNORTHODOX GAS WELL LOCATION
AND FOR DOWNHOLE COMMINGLING,
SAN JUAN COUNTY, NEW MEXICO.

APPLICATION OF MERIDIAN OIL INC. CASE NO. 10920 FOR DOWNHOLE COMMINGLING AND UNORTHODOX GAS WELL LOCATIONS, SAN JUAN COUNTY, NEW MEXICO

APPLICATION OF MERIDIAN OIL INC CASE NO. 10921 FOR DOWNHOLE COMMINGLING, SAN JUAN COUNTY, NEW MEXICO

CONSOLIDATED PRE-HEARING STATEMENT

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

Pre-Hearing Statement Case No. 10919 Page 2

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:

In these consolidated cases, Meridian Oil Inc. seeks approval to downhole commingle Pictured Cliffs Gas in various Pools with Basin-Fruitland Coal Gas Pool production within the wellbore of six existing Pictured Cliffs formation wells and within two new wells to be drilled.

In addition, certain wells will also be unorthodox in either the Basin-Fruitland Coal Gas Pool and/or the Pictured Cliffs Pool due to topography, BLM limitations, and utilization of existing wells to reduce costs.

Attached as Exhibit "A" is a summary of the requested relief for each well.

As previously approved by the Division in other cases, Meridian will propose a monthly allocation formula based on initial production tests and know/assumed parameters from the Pictured Cliffs zones whereby its initial rate, estimated ultimate recovery and decline rates can be determined with any production rate over what is calculated for the Pictured Cliffs being attributed to the Fruitland coal gas interval.

Pre-Hearing Statement Case No. 10919 Page 3

As previously approved by the Division in other cases, Meridian will present a graph to be utilized as an accurate and reliable means by which to establish an Economic Limit for the downhole commingling of production from either of these two pools.

As set forth in four separate applications, Meridian will establish, among other things, that:

- (1) Ownership is NOT identical within each spacing unit;
- (2) That in each instance on an existing well, either the Pictured Cliffs' production and/or the Basin Fruitland Coal Gas production is of such low productivity that it cannot be economically continued unless it is done so by downhole commingling that production with Basin Fruitland Coal Gas production in this well;
- (3) That in each instance for a new well to be drilled, the Pictured Cliffs' production is expected to be of such low productivity that it cannot be economically produced unless it is done so by downhole commingling that production with Basin Fruitland Coal Gas production in the well;
- (4) There will be no crossflow and no reservoir damage will occur;
- (5) The value of the commingled production will not be less than the sum of the values of the individual production;
- (6) Approval will allow the economic recovery of gas which might otherwise be left in the reservoirs thereby preventing waste.

Pre-Hearing Statement Case No. 10919 Page 4

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS	
Jay Close (geologist)	20 min.	est. 8	
Alan Alexander (landman)	20 min.	est. 16	
Scott Daves (petroleum engineer)	30 min.	est. 16	

PROCEDURAL MATTERS

NONE.

KELLAHIN AND KELLAHIN

W. Thomas Kellahin

P.O. Box 2265

Santa Fe, New Mexico 87504

(505) 982-4285

NMOCD CASES 10918 - 10921 FEBRUARY 17, 1994

10920 C M MORRIS #100 10920 HIJERFANO UNIT COM #509	1092] IJUERFANO (JNTT #74 1092] AUERFANO UNIT #18	10918 NEUDECKI:R #2 10918 ZACHRY #11 10918 PIERCE FEDERAL A #1	10919 LODEWICK#1	CASE # WELL NAME
NE/4 - S/2 NW/4 - N/2	SW/4 - W/2 SW/4 - S/2	NE/4 - E/2 • - S/2 NE/4 - N/2	NW/4 - W/2	SPACING PC/FTC
FULCHER KUTZ P.C. FULCHER KUTZ P.C.	FULCHER KUTZ P.C. KUTZ P.C. WEST	AZTEC P.C. AZTEC P.C. AZTEC P.C.	FULCHER KUTZ P.C.	FIELD#I
NO O	SHA SHA SHA	YES YES	YES	EXISTING FORM.
FTC	FTC FTC	FIC	FIC	** FIELD #2
O O	N O	S S S	NO	EXISTING FORM
027N010W10G NEWDRI 027N010W30D NEWDRI	027N010W19M 027N019W32M	029N010W35G 028N010W10M 029N010W34A	027N009W18D RECOMP	
NEWDRI. NEWDRI.	RECOMP	RECOMP RECOMP	RECOMP	RECOMP/ MARGINA LOCATION NEW DRILL FORM
ਨ ਨ ਨ	నెన	FTC FTC	PC	RECOMP/ MARGINAL NEW DRILL FORM
NSI.	- NSL-Vab	NSP-APP -	ı	PC C
NSL NSL-OPL	1 1	1 1 1	OPI.	FTC FOC

* Note: Lot 1, SE/SE Sec. 9; Lots 3, 4, S/2 SW/4 Sec.10

" FTC = Basin Fruitland Coal NSL = Non-Standard Location

OPL = Off Pattern Location
NSP-APP = Non-Standard Spacing Unit previously approved
NSL-APP = Non-Standard Location previously approved