

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

**RECEIVED**

IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
DIVISION FOR THE PURPOSE OF  
CONSIDERING:

FEB 15 1991

OIL CONSERVATION DIV.  
SANTA FE

CASE NO. 10247

APPLICATION OF MERIDIAN OIL INC.  
FOR AN UNORTHODOX OIL WELL LOCATION,  
EDDY 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  
(name, address, phone  
and contact person)

ATTORNEY

Meridian Oil Inc.  
P.O. Box 4289  
Farmington, New Mexico 87499  
Attn: Mr. Don Davis  
(915) 686-5600

W. Thomas Kellahin  
KELLAHIN, KELLAHIN & AUBREY  
P.O. Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285

OPPOSITION OR OTHER PARTY  
(name, address, phone  
and contact person)

ATTORNEY

**STATEMENT OF CASE**

APPLICANT

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

Meridian Oil Inc. seeks approval of an unorthodox oil well location to be drilled 1140 feet FSL and 330 feet FEL (Unit P) of Section 3, T19S, R30E. The SE/4SE/4 of said Section 3 is to be dedicated to said well forming a standard 40-acre oil spacing and proration unit for any and all formations and/or pools to the base of the Grayburg formation spaced on 40-acre oil spacing and proration units, which presently includes but is not necessarily limited to the Undesignated Shugart Pool and Undesignated North Benson Queen Grayburg Pool.

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.)

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
Don Davis (landman)	5 Min.	Waiver and notices
Lee Catalano (geologist)	15 Min.	Structure and Isopach Topo map / potash
Mo Gaddis (petroleum engineer)	15 Min.	Economics Well costs and Directional drilling analysis

OPPOSITION

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
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**PROCEDURAL MATTERS**

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

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin  
P.O. Box 2265  
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