

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:

OIL CONSERVATION DIVISION

CASE NO. 10253

APPLICATION OF AMERADA HESS  
CORPORATION FOR STATUTORY  
UNITIZATION OF THE NORTH MONUMENT  
GRAYBURG-SAN ANDRES UNIT,  
LEA 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

Amerada Hess Corporation

William F. Carr, Esq.  
Campbell & Black, P.A.  
P.O. Box 2208  
Santa Fe, NM 87504  
(505) 988-4421

Pre-hearing Statement  
NMOCD Case No. 10253  
Page 2

INTERESTED PARTY  
(name, address, phone  
and contact person)

Meridian Oil Inc.  
P.O. Box 51810  
Midland, TX 79710  
Attn: Mo Gaddis  
(915) 686-5784

ATTORNEY

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

#### STATEMENT OF CASE

##### APPLICANT

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

##### INTERESTED PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

Meridian Oil Inc. is an offset operator and is concerned about the potential effects the waterflood/statutory unitization project may have on its property.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
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INTERESTED PARTY

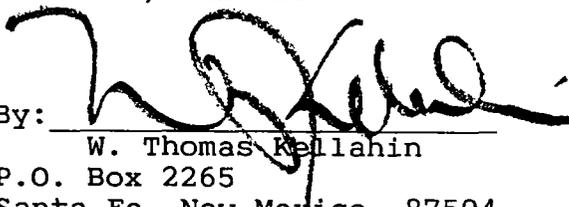
POTENTIAL WITNESSES (name and expertise)	EST. TIME	EXHIBITS
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Mo Gaddis

**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

Santa Fe, New Mexico 87504

(505) 982-4285

STATE OF NEW MEXICO  
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PRE-HEARING STATEMENT

This pre-hearing statement is submitted by ARCO Oil & Gas Company as required by the Oil Conservation Division.

**APPEARANCE OF PARTIES**

APPLICANT

(name, address, phone  
and contact person)

Amerada Hess Corporation

ATTORNEY

William F. Carr, Esq.  
Campbell & Black, P.A.  
P.O. Box 2208  
Santa Fe, NM 87504  
(505) 988-4421

Pre-hearing Statement  
NMOCD Case No. 10253  
Page 2

**INTERESTED PARTY**  
(name, address, phone  
and contact person)

ARCO Oil & Gas Company  
P.O. Box 1610  
Midland, TX 79701  
Attn: Ron Sponberg, Esq.  
(915) 688-5734

**ATTORNEY**

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

**STATEMENT OF CASE**

APPLICANT

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

INTERESTED PARTY

(Please make a concise statement of the basis for opposing  
this application or otherwise state the position of the  
party filing this statement.)

ARCO Oil & Gas Company is an interested party in this  
matter and neither supports or opposes the case at this  
time.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES  
(name and expertise)

EST. TIME

EXHIBITS

INTERESTED PARTY

WITNESSES  
(name and expertise)

EST. TIME

EXHIBITS

None.

**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

Santa Fe, New Mexico 87504

(505) 982-4285