OIL CONSERVE OUN DIVISION REC: VED

LAW OFFICES

LOSEE, CARSON, HAAS & CARROLL, P. A. PM 9 05 TELEPHONE

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May 18, 1992

VIA FACSIMILE AND FIRST CLASS MAIL

Mr. William J. LeMay, Director New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87501

Applications of Meridian Oil, Inc. for

Compulsory Pooling, Case Nos. 10502, 10503,

10504

Dear Mr. LeMay:

ERNEST L. CARROLL JOEL M. CARSON

JAMES E. HAAS

DEAN B. CROSS MARY LYNN BOGLE

A. J. LOSEE

I am enclosing herewith an Entry of Appearance for filing in each of the above-referenced cases, along with a Consolidated Pre-Hearing Statement.

Please notify us of any continuations of these cases.

Very truly yours,

LOSEE, CARSON, HAAS & CARROLL, P.A.

- init - Court Érnest L. Carroll

ELC: kth

xc w/enc: Karen Aubrey

C. W. Trainer

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

IN THE MATTER OF THE APPLICATION OF MERIDIAN OIL, INC. FOR CUMPULSORY POOLING, LEA COUNTY, NEW MEXICO

CASE NOS. 10502/10503

10504

CONSOLIDATED PRE-HEARING STATEMENT

This prehearing statement is submitted by A. J. Losee and C. W. Trainer, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Meridian Oil, Inc.

Karen Aubrey

:

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Kellahin, Kellahin & Aubrey P. O. Box 2265

AUG 1 7 1992

Santa Fe, NM 87504

OPPOSITION

QIL CONSERVATION DIVISION

A. J. Losee

C. W. Trainer

P. O. Box 755

Hobbs, New Mexico 88240

(505) 393-2727

Ernest L. Carroll

Losee, Carson, Haas & Carroll, P.A.

P. O. Drawer 239

Artesia, New Mexico 88211-0239

(505)746-3505

STATEMENT OF CASE

APPLICANT

See Pre-Hearing Statement(s) of Meridian Oil, Inc.

OPPOSITION OR OTHER PARTY

A. J. Losee and C. W. Trainer object to each of Meridian's Applications for Compulsory Pooling filed in Case Nos. 10502, 10503 and 10504 on the basis that they will be adversely affected, and they intend to appear at the hearing in opposition to Meridian's applications.

PROPOSED EVIDENCE

OPPOSITION

Witnesses will include C. W. Trainer, A. J. Losee, and as-yet unnamed Geologist and Engineer. Presently, the parties are still communicating concerning this matter, and it is unknown at this time whether or not C. W. Trainer will present any exhibits.

LOSEE, CARSON, HAAS & CARROLL, P.A.

P. O. Drawer 239

Artesia, New Mexico 88211-0239

Attorneys for A. J. Losee and C. W. Trainer

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. 10503

APPLICATION OF MERIDIAN OIL INC. FOR COMPULSORY POOLING, 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

David Parkhurst MERIDIAN OIL INC. P.O. Box 51810 Midland, TX 79710 **ATTORNEY**

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

OPPOSITION OR OTHER PARTY ATTORNEY

N/A

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QIL CONSERVATION DIVISION

Pre-Hearing Statement Case No. 10503
Page 2

STATEMENT OF CASE

APPLICANT

Meridian Oil Inc., Applicant, seeks an order pooling all mineral interests from the surface to the base of the Delaware formation or to a depth of 8700 feet, whichever is deeper, underlying the SW/4 NW/4 (Unit E) of Section 23 Township 22 South, Range 32 East, NMPM, forming a standard 40-acre oil spacing and proration unit within said vertical extent. Said unit is to be dedicated to its Red Tank #1 Well to be drilled at a standard location thereon. Also to be considered will be the cost of drilling and completing said well and the allocation of th ecost thereof as well as actual operating costs and charges for supervision, designation of applicant as the operator of the well and a charge for risk involved in drilling said well.

OPPOSITION OR OTHER PARTY

Pre-Hearing Statement Case No. 10503 Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
David Parkhurst Petroleum Engineer	20 Min.	Approx. 3-4 Exhib
Don Davis Landman	15-20 Min.	Approx. 2-3 Exhib.
Dennis Mairano Geologist OR		
Lee Catalano Geologist	20 Min.	Approx. 3-4 Exhib.
OPPOSITION		
WITNESSES	EST. TIME	EXHIBITS

SEE OPPOSITION FILING

PROCEDURAL MATTERS

None applicable at this time.

KELLAHIN and KELLAHIN

W. Thomas Kellahin

P.O. Box 2265

Santa Fe, New Mexico 87504

(505) 982-4285 Attorneys for Applicant

phst814b.014 Red Tank #1

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

:

IN THE MATTER OF THE APPLICATION OF MERIDIAN OIL, INC. FOR CUMPULSORY POOLING, LEA COUNTY, NEW MEXICO

CASE NOS. 10502, (10503

10504

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ENTRY OF APPEARANCE

OIL CONSERVATION DIVISION

COMES NOW Losee, Carson, Haas & Carroll, P. A. (Ernest L. Carroll), and hereby enters its appearance on behalf of A. J. Losee and C. W. Trainer in the above-referenced cases, thereby requesting notice of all docketings and copies of all filings.

LOSEE, CARSON, HAAS & CARROLL, P.A.

Bv:

Ernest L. Carroll P. O. Drawer 239

Artesia, New Mexico 88211-0239

(505) 746-3505

Attorneys for C. W. Trainer

KELLAHIN AND KELLAHIN

ATTORNEYS AT LAW

EL PATIO BUILDING

SANTA FE, NEW MEXICO 87504-2265

W. THOMAS KELLAHIN*

*NEW MEXICO BOARD OF LEGAL SPECIALIZATION RECOGNIZED SPECIALIST IN THE AREA OF NATURAL RESOURCES-OIL AND GAS LAW 117 NORTH GUADALUPE POST OFFICE BOX 2265

TELEPHONE (505) 982-4285 TELEFAX (505) 982-2047

JASON KELLAHIN (RETIRED 1991)

September 14, 1992

William J. LeMay
Oil Conservation Division
State Land Office Building
310 Old Santa Fe Trail
Room 219
Santa Fe, New Mexico 87501

HAND DELIVERED

RECEIVED

RE: Applications of Meridian Oil, Inc. for Compulsory Pooling, Lea County, New Mexico, NMOCD Case Nos. 10502, 10503 and 10504

SEP 1 5 1992

OIL CONSERVATION GIV. SANTA FE

Dear Mr. LeMay:

On behalf of Meridian Oil, Inc. we respectfully request that the above-referenced cases be dismissed as the parties have reached voluntary agreement.

In I A OV

Very truly yours,

W. Thomas Kellahin

WTK/jcl

xc: Don Davis - Meridian Oil, Inc. Ernest Carroll, Esq.

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