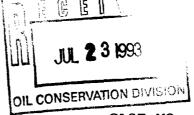
# STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

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



CASE NO. 10780 CASE NO. 10781 CASE NO. 10782

APPLICATIONS OF MARATHON OIL COMPANY FOR THREE UNORTHODOX GAS WELL LOCATIONS, SAN JUAN COUNTY, NEW MEXICO.

# CONSOLIDATED PRE-HEARING STATEMENT

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

### APPEARANCE OF PARTIES

APPLICANT

MARATHON OIL COMPANY P. O. Box 4289 Midland, Texas 79702 Attn: Thomas C. Lowry, Esq. Santa Fe, NM 87504 (915) 682-1626

**ATTORNEY** 

W. Thomas Kellahin KELLAHIN AND KELLAHIN P.O. Box 2265 (505) 982-4285

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#### STATEMENT OF CASE

### APPLICANT:

MARATHON OIL COMPANY seeks drill three "off-pattern" wells in the Basin-Fruitland Coal Gas Pool as follows:

NMOCD Case 10780: Bolack Well No 9-3

Unit C Section 9 T27N, R11W

E/2 dedication

NMOCD Case 10782: Bolack Well No 9-4

Unit I Section 9 T27N, R11W

W/2 dedication

NMOCD Case 10781: Schwerdtfeger Well No 1702

Unit I Section 17 T27N, R11W

E/2 dedication

Each of the unorthodox locations is located at a standard footage distance from the spacing unit line but is unorthodox because it is located in either the SE/4 or NW/4 of the Section rather than the NE/4 or SW/4.

Each of the three unorthodox locations has satisfied the surface location limitations imposed by the "NAPI" irrigation project. Each well is a replacement well to an original well in each spacing unit drilled in the correct quarter section.

These wells are in the under pressure area of the pool and are intended to replace poor producing wells thereby providing a better opportunity than the original wells to produce coal gas reserves underlying these spacing units.

No reservoir damage will occur and offsetting operators do not object. \\ \\

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### PROPOSED EVIDENCE

## APPLICANT

WITNESSES

EST. TIME EXHIBITS

Craig Kent

30 min.

5

(petroleum engineer)

## PROCEDURAL MATTERS

Applicant proposes to consolidate all three cases for purposes of hearing.

KELLAHIN AND KELLAHIN

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