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Mailing Address: P. O. Box 1020 Farmington, N.M. 87499

November 9, 1993

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State of New Mexico Energy, Minerals and Natural Resources Department New Mexico Oil Conservation Division P.O. Box 2088 Santa Fe, New Mexico 87501-2088

Attn: William J. Lemay, Director

Application of Merrion Oil & Gas Corporation for a short-radius Horizontal Directional Re: Drilling Pilot Project and Special Operating Rules therefore, McKinley County, New Mexico Case No. 10865

Dear Mr. Lemay:

Enclosed please find Applicant's Pre-Hearing Statement in the above-referenced matter.

Sincerely,

John Roberto

Tommy Roberts

TR:mkc Encl. Merrion Oil & Gas Corp. cc:

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. 10865

APPLICATION OF MERRION OIL & GAS CORPORATION FOR A SHORT-RADIUS HORIZONTAL DIRECTIONAL DRILLING PILOT PROJECT AND SPECIAL OPERATING RULES THEREFOR, MCKINLEY COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

Merrion Oil & Gas Corporation

P.O. Box 840

Farmington, New Mexico 87499

Attn: Steven S. Dunn

505/327-9801

OPPOSITION OR OTHER PARTY

Not Known

ATTORNEY

Tommy Roberts

P.O. Box 1020

Farmington, New Mexico 87499

505/325-1801

ATTORNEY

Not known

Pre-hearing Statement NMOCD Case No. 10865 Page 2

STATEMENT OF CASE

APPLICANT

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

Merrion Oil & Gas Corporation seeks authority from the New Mexico Oil Conservation Division to initiate a short-radius horizontal directional drilling pilot project in the Arena Blanca Entrada Pool in the N/2SE/4 of Section 36, Township 20 North, Range 5 West, N.M.P.M., McKinley County, New Mexico. A non-standard 80-acre oil spacing and proration unit will be dedicated to the well. Merrion proposes to utilize the Arena Blanca No. 1 Entrada well located 2,360' FSL and 1,200' FEL of Section 36. Merrion will plug back from the existing Entrada interval, kick-off from vertical, build angle to approximately 90 degrees with a short-radius curve and continue to drill approximately 400 feet of horizontal drain hole in a westerly direction. The target area will limit the horizontal displacement of the well's producing interval within 100 feet to the outer boundary of the 80-acre proration unit.

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.)

NOT KNOWN

Pre-Hearing Statement NMOCD Case No. 10865 Page 3

PROPOSED EVIDENCE

<u>APPLICANT</u>

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Steven S. Dunn - Petroleum Engineer	30 min.	 Well location and Lease Ownership Plat Structure/Net Pay Plat Directional Plan Proposed Wellbore Configuration Summary of Reasons Supporting Approval Proof of Notice

OPPOSITION

WITNESSES EST (Name and expertise)

EST. TIME

EXHIBITS

NOT KNOWN

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

NONE

oming Roberts

TOMMY ROBÉRTS, Attorney for Merrion Oil & Gas Corporation

DATED: November 8, 1993