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. 10971

APPLICATION OF MERRION OIL & GAS CORPORATION FOR A HIGH ANGLE HORIZONTAL DIRECTIONAL DRILLING PILOT PROJECT AND FOR THE PROMULGATION OF SPECIAL OPERATING RULES THEREFOR, SANDOVAL 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	ATTORNEY
MERRION OIL & GAS CORPORATION	Tommy Roberts
ATTN: GEORGE F. SHARPE	P.O. Box 1020
P.O. BOX 840	Farmington, New Mexico 87499
FARMINGTON, NEW MEXICO 87499	505/325-1805
505/327-9801	
OPPOSITION OR OTHER PARTY	ATTORNEY
Not Known	Not known

Pre-hearing Statement NMOCD Case No. 10971 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 an order of the Oil Conservation Division approving a high angle/horizontal directional drilling pilot project in the area of the Eagle Mesa Entrada Oil Pool and within the boundaries of its Eagle Mesa Entrada Secondary (Federal) Unit. The Unit consists of 280 acres located in portions of Section 11, 12, 13 and 14, Township 19 North, Range 4 West, N.M.P.M. Merrion also seeks the assignment of a special oil allowable based on the number of acres within the Unit as compared to the allowable which has been established for the Pool based on statewide spacing. In support of its application, Merrion will submit testimony and evidence which indicates that horizontal drilling techniques must be used to maximize the recovery of reserves on an economic basis.

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. 10971 Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)

EST. TIME

EXHIBITS

George F. Sharpe -Petroleum Engineer 20 min.

- Lease Ownership Plat

- Unit Agreement

- Entrada Dune Cross-Section & Schematic

- Entrada Structure Map

- Economic Analysis of Vertical vs.

Horizontal Drilling
- Target Window Map
- Proof of Service

OPPOSITION

WITNESSES

EST. TIME

EXHIBITS

(Name and expertise)

DATED: May 3, 1994

NOT KNOWN

PROCEDURAL MATTERS

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

NONE

TOMMY ROBERTS, Attorney for Merrion Oil & Gas Corporation

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TOMMY ROBERTS, Attorney for Merrion Oil & Gas Corporation

DATED: May 3, 1994

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