

JIIN 1 9 1990

OIL CONSILIVATION DIV. SANTA FE

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. 9974

APPLICATION OF MERIDIAN OIL, INC. FOR COMPULSORY POOLING, RIO ARRIBA COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by KELLAHIN, KELLAHIN & AUBREY as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT (name, address, phone and contact person)

ATTORNEY

Meridian Oil, Inc. P.O. Box 4289 Farmington, NM 87499 Attn: Alan Alexander (505) 326-9700

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

OPPOSITION OR OTHER PARTY (name, address, phone and contact person)

ATTORNEY

Pre-hearing Statement NMOCD Case No. Page 2

STATEMENT OF CASE

APPLICANT

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

Applicant has been unable to get three individuals to sign the BLM communitization agreements for the subject well despite the fact that the working interest of these same three individuals has already been contractually committed to the well.

In order to commit the record title interest of these parties in the absence of signature, the BLM requires a compulsory pooling order.

This is not the pooling of a working interest and, therefore, no issue about risk factor, AFE, overhead rates, etc. is involved.

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) Pre-hearing Statement NMOCD Case No. Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
Alan Alexander (landman)	20 min.	Application Correspondence and documen-
Jim Falconi (engineer)	15 min.	tation of efforts to get balance of record title committed to well Locator plat Plat of area and and spacing unit Communitization Agreement Well data

OPPOSITION

WITNESSES EST. TIME EXHIBITS (name and expertise)

PROCEDURAL MATTERS

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

KELLAHIN, KELLAHIN & AUBREY

By:
W. Thomas Kellahin
Post Office Box 2265

Santa Fe, New Mexico 87504

(505) 982-4285