# 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. 10196

APPLICATION OF MERRION OIL & GAS CORPORATION FOR A HORIZONTAL DIRECTIONAL DRILL-ING PROJECT, MCKINLEY COUNTY, NEW MEXICO

# PRE-HEARING STATEMENT

This prehearing 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
P.O. Box 840	P.O. Box 1020
Farmington, NM 87499	Farmington, NM 87499
(505) 327-9801	(505) 325-1801
name, address, phone and contact person	
OPPOSITION OR OTHER PARTY	ATTORNEY
No entries of appearance have been filed with the Oil Conservation Division as of the date of this Pre-Hearing Statement	
name, address, phone and contact person	

Pre-hearing Statement NMOCD Case No. 10196 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 New Mexico Oil Conservation Division authorizing a pilot project to first drill vertically, then plug back and directionally drill horizontally through the Entrada formation, at an unorthodox surface location. The horizontal wellbore will be drilled in a southeasterly direction within an approved target area. In addition, Merrion seeks approval for an unorthodox bottom hole oil well location for the subject well and permission to produce the vertical and/or horizontal wellbores.

#### Reasons:

- 1. A horizontal well should improve drainage efficiency and ultimate recovery of oil.
- 2. A horizontal well should minimize the tendency from bottom water coning, which will improve producing economics and ultimate oil recovery.

#### 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.)

No entries of appearance have been filed with the Oil Conservation Division as of the date of this Pre-Hearing Statement.

Bem sliding sale royalty

Pre-hearing Statement NMOCD Case No. 10196 Page 3

# PROPOSED EVIDENCE

## APPLICANT

WITNESSES (Name and expertise)

Steven Dunn,

Petroleum Engineer

20 - 30 Minutes

Land Plat

Map showing Entrada

Structure

Wellbore Schematic

# OPPOSITION

WITNESSES EST. TIME EXHIBITS (Name and expertise)

Not Applicable

# 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

Other exhibits not yet determined