LAW OFFICES

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TELEPHONE (505) 746-3505 TELECOPY (505) 746-6316

May 18, 1992

## VIA FACSIMILE AND FIRST CLASS MAIL

Mr. William J. LeMay, Director New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87501

> Applications of Meridian Oil, Inc. for Compulsory Pooling, Case Nos. 10502, 10503, 10504

Dear Mr. LeMay:

I am enclosing herewith an Entry of Appearance for filing in each of the above-referenced cases, along with a Consolidated Pre-Hearing Statement.

Please notify us of any continuations of these cases.

Very truly yours,

LOSEE, CARSON, HAAS & CARROLL, P.A.

ELC:kth

xc w/enc: Karen Aubrey

C. W. Trainer

:

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

IN THE MATTER OF THE APPLICATION OF

MERIDIAN OIL, INC. FOR CUMPULSORY

CASE NOS. 10502/10503

10504

POOLING, LEA COUNTY, NEW MEXICO

## CONSOLIDATED PRE-HEARING STATEMENT

This prehearing statement is submitted by A. J. Losee and C. W. Trainer, as required by the Oil Conservation Division.

#### APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Meridian Oil, Inc.

Karen Aubrey

Kellahin, Kellahin & Aubrey

P. O. Box 2265

Santa Fe, NM 87504

## **OPPOSITION**

A. J. Losee

C. W. Trainer

P. O. Box 755

Hobbs, New Mexico 88240

(505) 393-2727

Ernest L. Carroll

Losee, Carson, Haas & Carroll, P.A.

P. O. Drawer 239

Artesia, New Mexico 88211-0239

(505) 746-3505

#### STATEMENT OF CASE

# APPLICANT

See Pre-Hearing Statement(s) of Meridian Oil, Inc.

## OPPOSITION OR OTHER PARTY

A. J. Losee and C. W. Trainer object to each of Meridian's Applications for Compulsory Pooling filed in Case Nos. 10502, 10503 and 10504 on the basis that they will be adversely affected, and they intend to appear at the hearing in opposition to Meridian's applications.

#### PROPOSED EVIDENCE

#### **OPPOSITION**

Witnesses will include C. W. Trainer, A. J. Losee, and as-yet unnamed Geologist and Engineer. Presently, the parties are still communicating concerning this matter, and it is unknown at this time whether or not C. W. Trainer will present any exhibits.

LOSEE, CARSON, HAAS & CARROLL, P.A.

Ernest L. Carroll

P. O. Drawer 239

Artesia, New Mexico 88211-0239

(505) 746-3505

Attorneys for A. J. Losee and C. W. Trainer

# KELLAHIN, KELLAHIN AND AUBREY

ATTORNEYS AT LAW

EL PATIO BUILDING

W. THOMAS KELLAHIN\* KAREN AUBREY<sup>†</sup> 117 NORTH GUADALUPE POST OFFICE BOX 2265

TELEPHONE (505) 982-4285 TELEFAX (505) 982-2047

\*NEW MEXICO BOARD OF LEGAL SPECIALIZATION RECOGNIZED SPECIALIST IN THE AREA OF NATURAL RESOURCES-OIL AND GAS LAW

SANTA FE, NEW MEXICO 87504-2265

TALSO ADMITTED IN ARIZONA

JASON KELLAHIN (RETIRED 1991)

July 8, 1992

Mr. William J. LeMay Oil Conservation Division State Land Office Building 310 Old Santa Fe Trail, Room 219 Santa Fe, New Mexico 87501 HAND DELIVERED

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OIL CONSERVATION DIVISION

10502

RE: Applications of Meridian Oil, Inc. for Compulsory Pooling for their Red Tank #1, Red Tank #2 and Red Tank #3 Wells, NMOCD Cases 10502, 10503, and 10504, respectively, Lea County, New Mexico

Dear Mr. LeMay:

All three (3) of the above-reference applications contained an inadvertent error in their descriptions. All should have been listed in Range 32 West instead of Range 33 West. Currently, these cases are set to be heard on the August 6, 1992 Examiner's Docket. Enclosed please find an Amended Application for each case showing the correct range. On behalf of Meridian Oil Inc, we request that these cases be re-advertised and continued to the August 20, 1992 Examiner's Docket.

By copy of this letter and Amended Application to all parties to be pooled, we are notifying them by certified mail return receipt of this error and of their right to appear at the hearing, to make a statement to the Division, to present evidence and cross-examine witnesses either in support of or in opposition to the application. Those parties are directed to file a pre-hearing statement with the Division and send a copy to the undersigned not later than 4:00 PM on August 14, 1992.

Mr. William J. LeMay July 8, 1992 Page Two

In addition, these potential these potential parties are advised that the entry of a compulsory pooling order will affect their rights to share in the production from the subject well.

Sincerely,

Karen Aubrey

KA/jcl
Enclosures

xc: Don David (w/encl.) - Meridian Oil Inc.

By Certified Mail - Return Receipt Requested
To all parties listed in Paragraph (3) of the
Amended Applications

ltrk708.014

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

IN THE MATTER OF THE APPLICATION OF MERIDIAN OIL, INC. FOR CUMPULSORY POOLING, LEA COUNTY, NEW MEXICO

CASE NOS 10502, 10503

10504

## ENTRY OF APPEARANCE

COMES NOW Losee, Carson, Haas & Carroll, P. A. (Ernest L. Carroll), and hereby enters its appearance on behalf of A. J. Losee and C. W. Trainer in the above-referenced cases, thereby requesting notice of all docketings and copies of all filings.

LOSEE, CARSON, HAAS & CARROLL, P.A.

Ernest L. Carroll

P. O. Drawer 239

Artesia, New Mexico 88211-0239

(505) 746-3505

Attorneys for C. W. Trainer

P.08

# 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. 10502

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

#### PRE-HEARING STATEMENT

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

#### APPEARANCE OF PARTIES

APPLICANT

David Parkhurst MERIDIAN OIL INC. P.O. Box 51810 Midland, TX 79710 **ATTORNEY** 

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

OPPOSITION OR OTHER PARTY ATTORNEY

N/A

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OIL CONSERVATION DIVISION

Pre-Hearing Statement Case No. 10502 Page 2

#### STATEMENT OF CASE

#### APPLICANT

Meridian Oil Inc., Applicant, seeks an order pooling all mineral interests from the surface to the base of the Delaware formation or to a depth of 8700 feet, whichever is deeper, underlying the NW/4 NW/4 (Unit D) of Section 23 Township 22 South, Range 32 East, NMPM, forming a standard 40-acre oil spacing and proration unit within said vertical extent. Said unit is to be dedicated to its Red Tank #2 Well to be drilled at a standard location thereon. Also to be considered will be the cost of drilling and completing said well and the allocation of th ecost thereof as well as actual operating costs and charges for supervision, designation of applicant as the operator of the well and a charge for risk involved in drilling said well.

OPPOSITION OR OTHER PARTY

Pre-Hearing Statement Case No. 10502 Page 3

# PROPOSED EVIDENCE

## APPLICANT

WITNESSES EST. TIME EXHIBITS

David Parkhurst Approx.
Petroleum Engineer 20 Min. 3-4 Exhib

Don Davis Approx.
Landman 15-20 Min. 2-3 Exhib.

Dennis Mairano Geologist OR

Lee Catalano Approx.
Geologist 20 Min. 3-4 Exhib.

OPPOSITION

WITNESSES EST. TIME EXHIBITS

SEE OPPOSITION FILING

#### PROCEDURAL MATTERS

None applicable at this time.

KELLAHIN and KELLAHIN

W. Thomas Kellahin

P.O. Box 2265

Santa Fe, New Mexico 87504

(505) 982-4285

Attorneys for Applicant

phst814a.014 Red Tank #2

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

IN THE MATTER OF THE APPLICATION OF MERIDIAN OIL, INC. FOR CUMPULSORY POOLING, LEA COUNTY, NEW MEXICO

CASE NOS. (10502) 10503

RECENTED 504

ANUG 1 7 1992

# ENTRY OF APPEARANCE CONCERNATION DYNSON

COMES NOW Losee, Carson, Haas & Carroll, P. A. (Ernest L. Carroll), and hereby enters its appearance on behalf of A. J. Losee and C. W. Trainer in the above-referenced cases, thereby requesting notice of all docketings and copies of all filings.

LOSEE, CARSON, HAAS & CARROLL, P.A.

Ernest L. Carroll

P. O. Drawer 239

Artesia, New Mexico 88211-0239

(505)746-3505

Attorneys for C. W. Trainer

# KELLAHIN AND KELLAHIN

ATTORNEYS AT LAW

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SANTA FE, NEW MEXICO 87504-2265

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JASON KELLAHIN (RETIRED 1991)

\*NEW MEXICO BOARD OF LEGAL SPECIALIZATION RECOGNIZED SPECIALIST IN THE AREA OF NATURAL RESOURCES-OIL AND GAS LAW

W. THOMAS KELLAHIN\*

September 14, 1992

William J. LeMay Oil Conservation Division State Land Office Building 310 Old Santa Fe Trail Room 219 Santa Fe, New Mexico 87501 HAND DELIVERED

RECEIVED

RE: Applications of Meridian Oil, Inc. for Compulsory Pooling,

Lea County, New Mexico, NMOCD Case Nos. (10502), 10503

and 10504

SEP 1 5 1992

OIL CONSERVATION DIV. SANTA FE

Dear Mr. LeMay:

On behalf of Meridian Oil, Inc. we respectfully request that the above-referenced cases be dismissed as the parties have reached voluntary agreement.

Very truly yours,

W. Thomas Kellahin

WTK/jcl

xc: Don Davis - Meridian Oil, Inc. Ernest Carroll, Esq.

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