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October 22, 1992

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

Re: Application of Merrion Oil & Gas Corp. for Unit Agreement, Sandoval County, New Mexico. Case No. 10576

Dear Mr. Lemay:

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

Sincerely,

John Roberts Tommy Roberts

TR:mkc Encl.

#### 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. 10576

APPLICATION OF MERRION OIL & GAS CORPORATION FOR UNIT AGREEMENT, SANDOVAL 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 CORP.

P.O. Box 840

Farmington, NM 87499

505/327-9801

name, address, phone and contact person

OPPOSITION OR OTHER PARTY

ATTORNEY

Unknown

Unknown

name, address, phone and contact person -----

P.O. Box 1020

Tommy Roberts

Farmington, NM 87499

505/325-1801

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#### STATEMENT OF CASE

#### APPLICANT

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

Applicant, in the above-styled cause, seeks approval of the Rock Mesa Unit Agreement for an area comprising 10,823.16 acres, more or less, of Federal and State lands in portions of Townships 18 and 19 North, Range 3 West, which is centered approximately 18 miles south-southwest of Cuba, New Mexico.

#### OPPOSITION OR OTHER PARTY

(Please made a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

NOT APPLICABLE

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## PROPOSED EVIDENCE

### APPLICANT

	WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
1)	Doug Endsley Geologist	10 min.	Not yet determined
2)	Patrick Hegarty Landman	10 min.	Unit Agreement, Unit Operating Agreement, and Preliminary Approval by the Office of the Commissioner of Public Lands

## OPPOSITION

WITNESSES	EST.	TIME	EXHIBITS
(Name and expertise)			

NOT APPLICABLE

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

> > NONE

Dommy Roberts

TOMMY ROBERTS, Attorney for Merrion Oil & Gas Corp.

Dated: October 22, 1992