

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:

APPLICATION OF MEWBOURNE OIL COMPANY  
FOR AN UNORTHODOX OIL WELL LOCATION,  
LEA COUNTY, NEW MEXICO.

Case No. 13172

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Mewbourne Oil Company as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Mewbourne Oil Company  
Suite 1020  
500 West Texas  
Midland, Texas 79701

Attention: Steve Cobb  
(505) 682-3715

APPLICANT'S ATTORNEY

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

OPPONENT

John McDermott

OPPONENT'S ATTORNEY

J. Scott Hall

STATEMENT OF THE CASE

APPLICANT

Applicant seeks authorization to drill and produce its SF "17" Fed. Com. Well No. 2 at an unorthodox oil well location 1910 feet from the south line and 1370 feet from the east line of Section 17, Township 18 South, Range 32 East, N.M.P.M., in the Wolfcamp formation (Undesignated Young-Wolfcamp Pool) and Strawn formation (Undesignated Young-Strawn Pool). The NW¼SE¼ of Section 17 will be dedicated to the well. The well's main objective is the Morrow formation, and the well is orthodox in that zone.

OPPONENT

John McDermott has withdrawn his opposition.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES  
Ralph Nelson  
(geologist)

EST. TIME  
25 min.

- EXHIBITS
- (a) land plat
  - (b) Morrow isopach/  
structure map
  - (c) Strawn isopach
  - (d) cross-section
  - (e) production plat
  - (f) topographical  
maps
  - (g) waiver letter
  - (h) affidavit of  
notice

OPPONENT

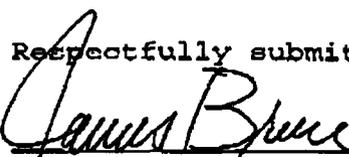
WITNESSES

EST. TIME

EXHIBITS

**PROCEDURAL MATTERS**

-None-

Respectfully submitted,  


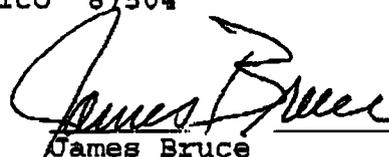
James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Newbourne Oil Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Pre-Hearing Statement was served via facsimile transmission upon the following counsel of record this 15<sup>th</sup> day of December, 2003:

J. Scott Hall  
Post Office Box 1986  
Santa Fe, New Mexico 87504  
(505) 989-9857

  
James Bruce

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

IN THE MATTER OF THE APPLICATION  
OF MEWBOURNE OIL COMPANY FOR AN  
UNORTHODOX OIL WELL LOCATION,  
LEA COUNTY, NEW MEXICO

CASE NO. 13,172

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Miller Stratvert P.A. (J. Scott Hall) on behalf of John McDermott, as required by the Oil Conservation Division.

**APPEARANCES**

APPLICANT'S ATTORNEY

J. Scott Hall, Esq.  
Miller Stratvert P.A.  
Post Office Box 1986  
Santa Fe, New Mexico 87504-1986  
(505) 989-9614

APPLICANT

John McDermott

OPPONENT'S ATTORNEY

James Bruce, Esq.  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

OPPONENT

Mewbourne Oil Company

WVS  
10/31/03

**STATEMENT OF THE CASE**

APPLICANT

Applicant seeks authorization to drill and produce its SF "17" Fed. Com. Well No. 2 at an unorthodox oil well location 1910' FSL and 1370" FEL of Section 17, T-18-S, R-32-E, in the Wolfcamp formation (Undesignated Young-Wolfcamp Pool) and Strawn formation (Undesignated Young-Strawn Pool). The NW/4 SE/4 of Section 17 will be dedicated to the well. The unit is located approximately 7-1/2 miles south-southwest of Maljamar, New Mexico.

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**OPPOSITION OR OTHER PARTY**

John McDermott is an overriding royalty interest owner whose participation in production from a well drilled at a standard location will be eliminated and otherwise adversely affected if the proposed unorthodox location is approved. The Applicant has set forth no grounds justifying an exception from the Division's rules and regulations governing well locations.

**PROPOSED EVIDENCE**

**APPLICANT**

<b>WITNESSES:</b>	<b>Est. Time</b>	<b>No. of Exhibits</b>
John McDermott/Petroleum Engineering	30 minutes	3

**PROCEDURAL MATTERS**

**Pre-Hearing Statement  
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MILLER STRATVERT P.A.

By: J. Scott Hall

J. Scott Hall  
Attorneys for John McDermott  
Post Office Box 1986  
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(505) 989-9614

**Certificate of Mailing**

I hereby certify that a true and correct copy of the foregoing was faxed to counsel of record on the 31st day of October, 2003 as follows:

Will Jones  
New Mexico Oil Conservation Division  
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J. Scott Hall

J. Scott Hall

STATE OF NEW MEXICO  
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES  
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IN THE MATTER OF THE APPLICATION  
OF MEWBOURNE OIL COMPANY FOR AN  
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LEA COUNTY, NEW MEXICO

CASE NO. 13,172

ENTRY OF APPEARANCE

Comes now JOHN McDERMOTT, by and through his undersigned attorneys, MILLER  
STRATVERT P.A., and hereby enters its appearance in the above cause.

MILLER STRATVERT P.A.

By: J. Scott Hall

J. Scott Hall  
Attorneys for John McDermott  
Post Office Box 1986  
Santa Fe, New Mexico 87504-1986  
(505) 989-9614

WJST  
10/27/03

Certificate of Mailing

I hereby certify that a true and correct copy of the foregoing was faxed to counsel of  
record on the 24<sup>th</sup> day of October, 2003, as follows:

James G. Bruce, Esq.  
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Santa Fe, New Mexico 87504-1056

J. Scott Hall  
J. Scott Hall