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2011 APR 21 P 3: 21

April 21, 2011

Ms. Florene Davidson
New Mexico Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

Hand Delivered

Re: NMOCD Case No. 14620: Application of Mewbourne Oil Company for Approval of a Water Disposal Well, Eddy County, New Mexico

Dear Ms. Davidson:

On behalf of Nearburg Producing Company, enclosed is an original and one copy of a Pre-Hearing Statement in the above-referenced case.

Very truly yours,

Karen Williams
Assistant to J. Scott Hall

JSH:kw
Enclosure

00274282

REPLY TO:

325 Paseo de Peralta
Santa Fe, New Mexico 87501
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STATE OF NEW MEXICO
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES
OIL CONSERVATION DIVISION

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2011 APR 21 P 3: 21

APPLICATION OF MEWBOURNE OIL COMPANY
FOR APPROVAL OF A WATER DISPOSAL WELL,
EDDY COUNTY, NEW MEXICO

CASE NO. 14620

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Nearburg Producing Company as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Mewbourne Oil Company

APPLICANT'S ATTORNEY

James Bruce, Esq.
P. O. Box 1056
Santa Fe, NM 87504
(505) 982-2043

OPPOSING PARTY

Nearburg Producing Company
3300 North "A" Street
Building 2, Suite 120
Midland, TX 79705-5421

OPPOSING PARTY'S ATTORNEY

J. Scott Hall
Montgomery & Andrews
P.O. Box 2307
Santa Fe, NM 87504-2307
(505) 982-3873

OTHER PARTY

Yates Petroleum Corporation

OTHER PARTY'S ATTORNEY

Gary W. Larson, Esq.
Hinkel Hensley Shanor & Martin LLP
P. O. Box 2068
Santa Fe, NM 87504
(505) 982-4554

STATEMENT OF THE CASE

Applicant seeks an order approving water disposal into the Upper Pennsylvanian Zone (Cisco/Canyon Formation) at a depth of 7685-7765 feet subsurface in the State B Well No. 2, located 660 feet from the north line and 660 feet from the west line of Section 33, Township 19 South, Range 25 East, NMPM.

NEARBURG PRODUCING COMPANY

Nearburg Producing Company owns oil and gas leasehold interests in the lands that are the subject of the Application. Nearburg opposes the Application for the reason that the proposed injection interval remains capable of producing hydrocarbons.

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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OPPOSING PARTY

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Russell Wickman, Landman	30 minutes	7
Bill Elton, Geologist	20 minutes	6
Tim Speer, Petroleum Engineer	20 minutes	6

OTHER PARTY

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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PROCEDURAL MATTERS

Respectfully submitted,

MONTGOMERY & ANDREWS, P. A.

By: 

J. Scott Hall
P.O. Box 2307
Santa Fe, NM 87504-2307
(505) 982-3873 - Telephone
(505) 982-4289 - Fax

Attorneys for Nearburg Producing Company

Certificate of Service

I hereby certify that on April 21, 2011, a true and correct copy of the foregoing was deposited with the U.S. Postal Service, with proper postage affixed, addressed as follows:

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Santa Fe, NM 87504-2068

James Bruce, Esq.
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J. Scott Hall

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