

BEFORE THE
OIL CONSERVATION DIVISION
NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS

**IN THE MATTER OF THE APPLICATION OF
MEWBOURNE OIL COMPANY FOR COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO.**

CASE NO. 11830

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Miller, Stratvert & Torgerson, P.A. on behalf of Mewbourne Oil Company, as required by the Oil Conservation Division.

APPEARANCES

APPLICANT'S ATTORNEY

J. Scott Hall, Esq.
Miller, Stratvert & Torgerson, P.A.
Post Office Box 1986
Santa Fe, NM 87501-1986
(505) 989-9614

APPLICANT

Mewbourne Oil Company

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OPPONENT'S ATTORNEY

W. Thomas Kellahin, Esq.
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OPPONENT

Devon Energy

OTHER PARTY'S ATTORNEY

N/A

OTHER PARTY

STATEMENT OF THE CASE

APPLICANT

Mewbourne Oil Company, Applicant in the above-styled cause seeks an order pooling all mineral interests from the surface to the base of the Morrow formation underlying the S/2 for all formations developed on 320-acre spacing, including the Avalon-Morrow gas pool, the West Burton Flat-Strawn gas pool and the Avalon-Upper Pennsylvanian gas pool; underlying the SW/2 for all formations developed on 160-acre spacing; underlying the E/2, SW/4 for all formations developed on 80-acre spacing; and underlying the NE/4, SW/4 for all formations developed on 40-acre spacing in Section 15, T-21-S, R-26-E. Said units are to be dedicated to Mewbourne's Carlsbad "15" Federal Com Well No. 1 to be drilled at a standard location 1,980 feet from the south line 1,850 feet from the west line (Unit K) of said Section 15. Also to be considered, will be the costs of drilling and completing said well and the allocation of the costs thereof, as well as actual operating costs and charges for supervision, designation of Mewbourne Oil Company as Operator of the well, and a charge for the risk involved for drilling said well.

OPPONENT

Subsequent to Mewbourne's application in this case, Devon Energy Corporation filed its application for compulsory pooling for the subject lands. (Application of Devon Energy Corporation for Compulsory Pooling, Eddy County, New Mexico, NMOCD Case No. 11833.)


PROPOSED EVIDENCE

WITNESSES:	Est. Time	Exhibits
Steve Cobb, Landman	30 minutes	Approx. 2
Keith Williams, Geologist	10 minutes	Approx. 4
Ken Calvert, Petroleum Engineer	20 minutes	Approx. 3

PROCEDURAL MATTERS

None.

MILLER, STRATVERT & TORGERSON, P.A.

By _____

J. Scott Hall
Attorneys for Applicant
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(505) 989-9614

Certificate of Mailing

I hereby certify that a true and correct copy of the foregoing was mailed to counsel of record on the 3 day of October, 1997, as follows:

W. Thomas Kellahin, Esq.
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Attorneys for Devon Energy

A handwritten signature in black ink, appearing to read "J. Scott Hall", written in a cursive style.

J. Scott Hall