

BEFORE THE
OIL CONSERVATION DIVISION
NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES
IN THE MATTER OF THE APPLICATION OF
APPLICATION OF MEWBOURNE OIL
COMPANY FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO

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CASE NO. 13021

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT'S ATTORNEY

James Bruce, Esq.
Post Office Box 1056
Santa Fe, New Mexico 87504

APPLICANT

Mewbourne Oil Company

OPPONENT'S ATTORNEY

J. Scott Hall
Miller Stratvert P.A.
Post Office Box 1986
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OPPONENT

Bass Enterprises Production Company
Perry R. Bass, Inc.
Thru Line, Inc.
Keystone, Inc.
Lee Bass, Inc.

OTHER PARTY'S ATTORNEY

OTHER PARTY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks the pooling of all interests from the base of the Wolfcamp formation to 100' below the base of the Morrow formation in the S/2 of Section 1, T-22-S, R-27-E in Eddy

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County for the drilling of its Otis "1" No. 1 well to be drilled at a standard 320-acre gas well location: Undesignated East Carlsbad-Strawn and Morrow Gas Pools.

OPPOSITION OR OTHER PARTY

Bass Enterprises, et al. opposes the pooling of its interests by Applicant.

PROPOSED EVIDENCE

APPLICANT

WITNESSES:	Est. Time	No. of Exhibits
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OPPOSITION

WITNESSES	EST. TIME	EXHIBITS
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None

PROCEDURAL MATTERS

None.

MILLER STRATVERT P.A.

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Attorneys for Shell Exploration and Production Company

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Certificate of Mailing

I hereby certify that a true and correct copy of the foregoing was delivered to counsel of record on the 10th day of March, 2003, as follows:



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