

RECEIVED

JUN 01 1992

KELLAHIN, KELLAHIN AND AUBREY

ATTORNEYS AT LAW
EL PATIO BUILDING
117 NORTH GUADALUPE
POST OFFICE BOX 2265

SANTA FE, NEW MEXICO 87504-2265

W. THOMAS KELLAHIN*
KAREN AUBREY*

*NEW MEXICO BOARD OF LEGAL SPECIALIZATION
RECOGNIZED SPECIALIST IN THE AREA OF
NATURAL RESOURCES-OIL AND GAS LAW
*ALSO ADMITTED IN ARIZONA

JASON KELLAHIN (RETIRED 1991)

OIL CONSERVATION DIV
SANTA FE
TELEPHONE (505) 982-4285
TELEFAX (505) 982-2047

MS.

June 1, 1992

Mr. Michael E. Stogner
Chief Hearing Examiner
Oil Conservation Division
310 Old Santa Fe Trail
Room 218
Santa Fe, New Mexico

HAND DELIVERED

RE: Mewbourne Application
for Compulsory Pooling,
N/2 of Section 35, T-17-S,
R-28-E, NMOCD Case No. 10484

Dear Mr. Stogner:

On behalf of Marathon Oil Company, please enter our appearance in the referenced case now set for hearing on the Examiner's docket scheduled for June 11, 1992.

Also enclosed is our prehearing statement.

Very truly yours,



W. Thomas Kellahin

WTK/jcl
Enclosure
xc: with Enclosure
Thomas Lowry, Esq.
James Bruce, Esq.

1trt601.092

RECEIVED

JUN 01 1992

OIL CONSERVATION DIV
SANTA FE

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. 10484

**APPLICATION OF MEWBOURNE OIL
COMPANY FOR COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO**

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by MARATHON OIL
COMPANY as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

MEWBOURNE OIL COMPANY

OTHER PARTY

Marathon Oil Company
P.O. Box 552
Midland, TX 79702
ATTN: Thomas Lowry

ATTORNEY

James G. Bruce
The Hinkle Law Firm
500 Marquette, NW #800
Albuquerque, NM 87102

ATTORNEY

W. Thomas Kellahin
KELLAHIN, KELLAHIN & AUBREY
P.O. Box 2265
Santa Fe, NM 87504
(505) 982-4285

Pre-Hearing Statement
Case No. 10484
Page 2

STATEMENT OF CASE

APPLICANT

SEE APPLICANT FILING

OPPOSITION OR OTHER PARTY

In order to protect its rights to a DeNovo Hearing, Marathon Oil Company enters its appearance in this matter as one of the parties whose interests the applicant seeks to pool.

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
SEE APPLICANT FILING		

OPPOSITION OR OTHER PARTY

WITNESSES	EST. TIME	EXHIBITS
NONE AT THIS TIME.		

Pre-Hearing Statement
Case No. 10484
Page 3

PROCEDURAL MATTERS

None at this time.

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin

P.O. Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285
ATTORNEYS FOR OTHER PARTY-
MARATHON OIL COMPANY

phst601.092

RECEIVED

JUN 01 1992

OIL CONSERVATION DIV.
SANTA FE

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. 10484

APPLICATION OF MEWBOURNE OIL
COMPANY FOR COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by MARATHON OIL
COMPANY as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

MEWBOURNE OIL COMPANY

OTHER PARTY

Marathon Oil Company
P.O. Box 552
Midland, TX 79702
ATTN: Thomas Lowry

ATTORNEY

James G. Bruce
The Hinkle Law Firm
500 Marquette, NW #800
Albuquerque, NM 87102

ATTORNEY

W. Thomas Kellahin
KELLAHIN, KELLAHIN & AUBREY
P.O. Box 2265
Santa Fe, NM 87504
(505) 982-4285

Pre-Hearing Statement
Case No. 10484
Page 2

STATEMENT OF CASE

APPLICANT

SEE APPLICANT FILING

OPPOSITION OR OTHER PARTY

In order to protect its rights to a DeNovo Hearing, Marathon Oil Company enters its appearance in this matter as one of the parties whose interests the applicant seeks to pool.

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
SEE APPLICANT FILING		

OPPOSITION OR OTHER PARTY

WITNESSES	EST. TIME	EXHIBITS
NONE AT THIS TIME.		

Pre-Hearing Statement
Case No. 10484
Page 3

PROCEDURAL MATTERS

None at this time.

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin

P.O. Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285
ATTORNEYS FOR OTHER PARTY-
MARATHON OIL COMPANY

phst601.092

RECEIVED

JUN 01 1992

OIL CONSERVATION DIV.
SANTA FE

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. 10484

APPLICATION OF MEWBOURNE OIL
COMPANY FOR COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by MARATHON OIL
COMPANY as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

ATTORNEY

MEWBOURNE OIL COMPANY

James G. Bruce
The Hinkle Law Firm
500 Marquette, NW #800
Albuquerque, NM 87102

OTHER PARTY

ATTORNEY

Marathon Oil Company
P.O. Box 552
Midland, TX 79702
ATTN: Thomas Lowry

W. Thomas Kellahin
KELLAHIN, KELLAHIN & AUBREY
P.O. Box 2265
Santa Fe, NM 87504
(505) 982-4285

Pre-Hearing Statement
Case No. 10484
Page 2

STATEMENT OF CASE

APPLICANT

SEE APPLICANT FILING

OPPOSITION OR OTHER PARTY

In order to protect its rights to a DeNovo Hearing, Marathon Oil Company enters its appearance in this matter as one of the parties whose interests the applicant seeks to pool.

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
SEE APPLICANT FILING		

OPPOSITION OR OTHER PARTY

WITNESSES	EST. TIME	EXHIBITS
NONE AT THIS TIME.		

Pre-Hearing Statement
Case No. 10484
Page 3

PROCEDURAL MATTERS

None at this time.

KELLAHIN, KELLAHIN & AUBREY

By: 
W. Thomas Kellahin

P.O. Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285
ATTORNEYS FOR OTHER PARTY-
MARATHON OIL COMPANY

phst601.092

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. 10,484

APPLICATION OF MEWBOURNE OIL
COMPANY FOR COMPULSORY POOLING
AND AN UNORTHODOX GAS WELL
LOCATION, EDDY COUNTY, NEW MEXICO.

RECEIVED

JUN 10 1981

OIL CONSERVATION DIVISION

PRE-HEARING STATEMENT

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

APPEARANCE OF PARTIES

APPLICANT

Mewbourne Oil Company
500 West Texas
Suite 1020
Midland, Texas 79701
(915) 682-3715
Attention: D. Paul Haden

ATTORNEY

James Bruce
Hinkle, Cox, Eaton, Coffield
& Hensley
Post Office Box 2068
Santa Fe, New Mexico 87504-2068
(505) 982-4554

OPPOSITION OR OTHER PARTY

ATTORNEY

STATEMENT OF CASE

APPLICANT

Applicant seeks to force pool the N½ of Section 35-17 South-28 East. Several lessees have not yet committed their interests to the well. Applicant requests a 200% non-consent penalty against non-consenting lessees, and that operating charges be established. An unorthodox location is requested based on geology.

OPPOSITION OR OTHER PARTY

PROPOSED EVIDENCE

APPLICANT

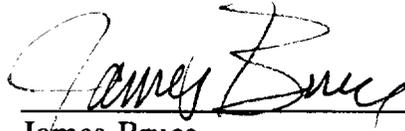
	WITNESSES	EST. TIME		EXHIBITS
1.	D. Paul Haden (Landman)	10 minutes	(a) (b) (c)	Land Plat. Correspondence with parties. Affidavit of Notice.
2.	Dexter Harmon (Geologist)	10 minutes	(a) (b) (c) (d)	Isopachs. Structure map. Cross-section. Production map.

OPPOSITION

PROCEDURAL MATTERS

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD
& HENSLEY

A handwritten signature in cursive script, appearing to read "James Bruce", is written over a horizontal line.

James Bruce
Post Office Box 2068
Santa Fe, New Mexico 87504-2068
(505) 982-4554

Attorneys for Applicant