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#### VIA HAND DELIVERY

Ms. Florene Davidson Oil Conservation Division State Land Office Building Santa Fe, New Mexico 87503 RECEIVED

OCT 1 3 1992

OIL CONSERVATION DIVISION

Dear Florene:

Enclosed, regarding Case No. 10,568, are an original and two copies of a Pre-Hearing Statement.

Very truly yours,

HINKLE, COX, EATON, COFFIELD

& HENSLEY

James Bruce

w

JB:frs Enclosures

# 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. 10,568

APPLICATION OF MEWBOURNE OIL COMPANY FOR AN UNORTHODOX INFILL GAS WELL LOCATION AND SIMULTANEOUS DEDICATION, EDDY COUNTY, NEW MEXICO.

RECEIVED

00111109

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** 

**ATTORNEY** 

Mewbourne Oil Company 550 West Texas Suite 1020 Midland, Texas 79701 (915) 682-3715 Attention: D. Paul Haden James Bruce Hinkle, Cox, Eaton, Coffield

& Hensley

Post Office Box 2068

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OPPOSITION OR OTHER PARTY

**ATTORNEY** 

Pre-Hearing Statement NMOCD Case No. 10,568 Page 2

### STATEMENT OF CASE

# **APPLICANT**

Applicant seeks to drill its Chalk Bluff Fed. No. 3 Well to test the Morrow formation at an unorthodox location (1980 feet FSL and 990 feet FEL) in Section 1 - 18 South - 27 East, and to simultaneously dedicate the well to the S½ of Section 1 together with its Chalk Bluff Fed. No. 1 Well (located in the SW¼ of Section 1). The existing wells in Section 1, the Chalk Bluff Fed. No. 1 in the SW¼, and the Chalk Bluff Fed. No. 2 in the NW¼, are not capable of draining 320 acres each. In addition, a well located in the W½ of Section 6 - 18 South - 28 East, is draining the SE¼ of Section 1. Thus, the new well is needed to offset the Section 6 Well, to protect correlative rights of Section 1 owners.

# **OPPOSITION**

## PROPOSED EVIDENCE

## **APPLICANT**

| WITNESSES                    | EST. TIME  | EXHIBITS  |
|------------------------------|------------|---|
| D. Paul Haden<br>(Landman)   | 5 minutes  | <ul><li>(a) Land plat</li><li>(b) Notice letters</li></ul>                        |
| Dexter Harmon<br>(Geologist) | 15 minutes | <ul><li>(a) Structure map</li><li>(b) Isopach</li><li>(c) Cross-section</li></ul> |
| Robin Vasicek (Engineer)     | 20 minutes | (a) Decline curves (b) Volumetric calculations                                    |

Pre-Hearing Statement NMOCD Case No. 10,568 Page 3

# **OPPOSITION**

WITNESSES

EST. TIME

**EXHIBITS** 

# PROCEDURAL MATTERS

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD & HENSLEY

James Bruce

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Attorneys for Mewbourne Oil Company