

**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. 10810

APPLICATION OF MARBOB ENERGY
CORPORATION FOR STATUTORY
UNITIZATION, EDDY COUNTY,
NEW MEXICO.

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PRE-HEARING STATEMENT

This prehearing statement is submitted by William F. Carr, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Marbob Energy Corporation
Post Office Drawer 217
Artesia, New Mexico 88211-0217
Attn: Raye Miller
(505) 748-3303

name, address, phone and
contact person

ATTORNEY

William F. Carr, Esq.
Campbell, Carr, Berge & Sheridan, P.A.
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

OPPOSITION OR OTHER PARTY

name, address, phone and
contact person

ATTORNEY

STATEMENT OF CASE

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

Marbob seeks an order unitizing, for the purpose of establishing a secondary recovery project, all mineral interests in the Grayburg-Jackson Pool, Seven Rivers, Queen, Grayburg and San Andres formations, underlying 5149.44 acres, more or less, of federal land comprising portions of Township 17 South, Ranges 29 and 30 East, to be designated the Burch-Keely Unit Area. To be considered will be those matters required by the New Mexico Statutory Unitization Act, Subsection 70-7-1 et seq., N.M.S.A. 1978 and other provisions of the unit agreement and unit operating agreement.

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

PROPOSED EVIDENCE

APPLICANT

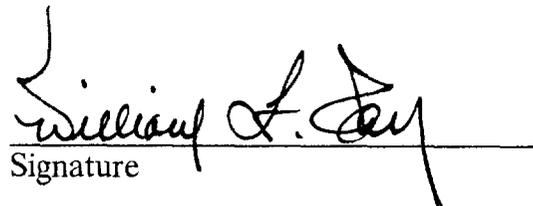
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
John R. Gray (Practical Oilman)	15 Min.	Approximately 6

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

(Please identify any procedural matters which need to be resolved prior to hearing)


Signature