

HINKLE, COX, EATON, COFFIELD & HENSLEY

PAUL W. EATON
CONRAD E. COFFIELD
HAROLD L. HENSLEY, JR.
STUART D. SHANOR
ERIC D. LANPHERE
C. D. MARTIN
ROBERT P. TINNIN, JR.
MARSHALL G. MARTIN
MASTON C. COURTNEY**
DON L. PATTERSON**
DOUGLAS L. LUNSFORD
NICHOLAS J. NOEDING
T. CALDER EZZELL, JR.
WILLIAM B. BURFORD*
RICHARD E. OLSON
RICHARD R. WILFONG*
THOMAS J. MCBRIDE
JAMES J. WECHSLER
NANCY S. CUSACK
JEFFREY L. FORNACIARI
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JOHN C. CHAMBERS*
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MARK C. DOW
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JEFFREY S. BAIRD*
THOMAS E. HOOD**
REBECCA NICHOLS JOHNSON
WILLIAM P. JOHNSON
STANLEY K. KOTOVSKY, JR.
H. R. THOMAS
ELLEN S. CASEY
MARGARET CARTER LUDEWIG
S. BARRY PAISNER
COLEMAN YOUNG**
MARTIN MEYERS
WYATT L. BROOKS**
DAVID M. RUSSELL**
ANDREW J. CLOUTIER
STEPHANIE LANDRY
KIRT E. MOELLING**

GREGORY S. WHEELER
JAMES A. GILLESPIE
GARY W. LARSON
MARGARET R. MCNETT
LISA K. SMITH*
NORMAN D. EWART
DARREN T. GROCE*
MOLLY MCINTOSH
MARCIA B. LINCOLN
SCOTT A. SHUART*
PAUL G. NASON
CATHRYN MCCLANAHAN

ATTORNEYS AT LAW

218 MONTEZUMA

POST OFFICE BOX 2068

SANTA FE, NEW MEXICO 87504-2068

(505) 982-4554

FAX (505) 982-8623

LEWIS C. COX, JR. (1924-1993)
ROY C. SNODGRASS, JR. (1914-1987)
CLARENCE E. HINKLE (1904-1985)
W. E. BONDURANT, JR. (1913-1973)

OF COUNSEL
O. M. CALHOUN*
MACK EASLEY
JOE W. WOOD
RICHARD L. CAZZELL**
RAY W. RICHARDS**
L. A. WHITE**

AUSTIN AFFILIATION
HOFFMAN & STEPHENS, P.C.
KENNETH R. HOFFMAN
TOM D. STEPHENS
RONALD C. SCHULTZ, JR.

700 UNITED BANK PLAZA
POST OFFICE BOX 10
ROSWELL, NEW MEXICO 88202
(505) 622-6510
FAX (505) 623-9332

2800 CLAYDESTA CENTER
6 DESTA DRIVE
POST OFFICE BOX 3580
MIDLAND, TEXAS 79702
(915) 583-4691
FAX (915) 683-6518

1700 BANK ONE CENTER
POST OFFICE BOX 9238
AMARILLO, TEXAS 79105
(806) 372-5569
FAX (806) 372-9761

500 MARQUETTE N.W., SUITE 800
POST OFFICE BOX 2043
ALBUQUERQUE, NEW MEXICO 87103
(505) 768-1500
FAX (505) 763-1529

401 WEST 15TH STREET, SUITE 800
TEXAS MEDICAL ASSOCIATION BUILDING
AUSTIN, TEXAS 78701
(512) 476-7137
FAX (512) 476-5431

*NOT LICENSED IN NEW MEXICO
**FORMERLY COMPRISING THE FIRM OF
CULTON, MORGAN, BRITAIN & WHITE, P.C.

April 25, 1994

HAND DELIVERED

APR 25 1994

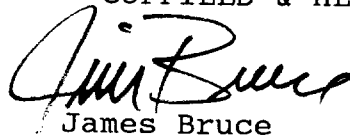
Florene Davidson
Oil Conservation Division
State Land Office Building
Santa Fe, New Mexico 87503

Dear Florene:

Enclosed are an original and two copies of a pre-hearing statement for Case Nos. 10959 and 10960.

Very truly yours,

HINKLE, COX, EATON,
COFFIELD & HENSLEY


James Bruce

JB:jr
Enclosure

STATE OF NEW MEXICO
ENERGY, MINERAL AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
DIVISION FOR THE PURPOSE OF
CONSIDERING:

APR 25 1994

APPLICATION OF MEWBOURNE OIL
COMPANY FOR STATUTORY UNITIZATION,
LEA COUNTY, NEW MEXICO.

CASE NO. 10,959

APPLICATION OF MEWBOURNE OIL
COMPANY FOR APPROVAL OF A WATER-
FLOOD PROJECT AND QUALIFICATION
FOR THE RECOVERED OIL TAX RATE,
LEA COUNTY, NEW MEXICO.

CASE NO. 10,960

CONSOLIDATED 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
Suite 1020
550 West Texas
Midland, Texas 79701
Attn: Steven Cobb
(915) 682-3715

Attorney:

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

Other Party:

Attorney:

STATEMENT OF CASE:

Applicant:

Applicant seeks to statutorily unitize the Querecho Plains-Queen Associated Pool underlying parts of Sections 21, 22, 23, 26, 27 and 28 of Township 18 South - Range 32 East, and to institute a secondary recovery waterflood project for the unit. Although the requisite percentages of working and royalty interests have approved the unit, there are uncommitted interests at this time. Applicant further requests rules for the waterflood which allow the drilling or recompletion of additional injection or producing wells without the necessity of further hearings. Applicant also seeks to qualify the project for the Recovered Oil Tax Rate.

OPPOSITION

PROPOSED EVIDENCE

APPLICANT:

	WITNESS	ESTIMATED TIME	EXHIBITS
1.	Steven Cobb (Landman)	30 minutes	(a) Land plat. (b) Unit Agreement/Unit

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			Operating Agreement.
	(c)		Ownership summaries.
	(d)		BLM letter of preliminary approval.
	(e)		Summaries of contacts with parties.
	(f)		Affidavit of Notice.
2.	Kevin Mayes (Engineer)	45 minutes	
			(a) Type log.
			(b) Cross-section.
			(c) Isopachs.
			(d) Production data.
			(e) Feasibility study.
			(f) Injectivity test results.
			(g) Economic summaries.
			(h) C-108.
			(i) Pressure gradient data.
			(j) Affidavit of Notice.

OPPOSITION

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

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A handwritten signature in cursive script, reading "James Bruce". The signature is written in dark ink and is positioned above a horizontal line.

James Bruce
Hinkle, Cox, Eaton,
Coffield & Hensley
Post Office Box 2068
Santa Fe, New Mexico 87504-2068
Attorneys for Applicant

C:\VGB\MRW.STM