

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION COMMISSION**

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

**APPLICATION OF TOM M. RAGSDALE TO REVOKE
ORDER NOS. R-20924 & R-20924-A OR, IN THE ALTERNATIVE,
TO DECLARE UNREASONABLE CERTAIN COSTS
IMPOSED BY MEWBOURNE OIL COMPANY**

**Case No. 21902
(Division Case No. 21324)**

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Mewbourne Oil Company ("Mewbourne") as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Tom M. Ragsdale

APPLICANT'S ATTORNEY

Montgomery & Andrews, P.A.

OPPONENTS

Mewbourne Oil Company

OPPONENTS' ATTORNEYS

James Bruce

STATEMENT OF THE CASE

APPLICANT

Mr. Ragsdale seeks an order revoking or modifying pooling Order Nos. R-20294 and R-20904-A, or declaring certain well costs unreasonable.

OPPONENT

The above orders pool the E/2E/2 of Section 15 and the E/2E/2 of Section 10, Township 23 South, Range 34 East, N.M.P.M., in Lea County, and cover four wells. Mr. Ragsdale challenges certain well costs incurred by Mewbourne.

Mewbourne's position in this appeal conforms to the Conclusions of Law set forth at pages 11-15 of Division Order No. R-21631, which is submitted as Mewbourne's Exhibit 3 filed with the Commission. Those conclusions are based on the testimony and the law presented by

Mewbourne before the Division. Rather than set them forth again, Mewbourne adopts them herein by reference.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

Mitch Robb
(landman)

30 min.

Approx. 10

Travis Cude
(engineer)

25 min.

Approx. 6

PROCEDURAL MATTERS

Respectfully submitted,



James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

jamesbruc@aol.com

Attorney for Mewbourne Oil Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 7th day of January, 2022 by e-mail:

Sharon Shaheen

sshaheen@montand.com



James Bruce