

**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:**

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

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 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. However, two of the wells, the Ibex 15/10 B3PA Fed. Com. Well No. 1H and the Ibex 15/10 B1PA Fed. Com. Well No. 2H, have not yet been drilled (they are scheduled to be commenced later this month). Thus any challenge to well costs is not ripe. See Ordering Paragraph 28 of Order No. R-20294-A.

Moreover, Mr. Ragsdale did not enter an appearance in either Case No. 20580 or Case No. R-20809 despite receiving notice thereof by certified mail. Therefore this application is a collateral attack on final orders which were never appealed.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

Mitch Robb
(landman)

30 min.

Approx. 10

Corey Mitchell
(Landman)

20 min.

Approx. 6

Jordan Carrell
(geologist)

20 min.

Approx. 6

Travis Cude
(engineer)

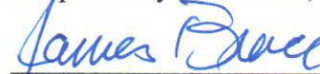
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Approx. 6

PROCEDURAL MATTERS

1. Mewbourne will be filing a motion to dismiss, or in the case.
2. Mewbourne objects to presentation of the case by affidavit. Mewbourne does not object to using the July 9th hearing for a status conference, and thereafter continue the case to a date after July.

Respectfully submitted,



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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 2nd day of July, 2020 by e-mail:

Sharon Shaheen
sshheen@montand.com

John McIntyre
jmcintyre@montand.com



James Bruce