

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

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

C 5/50

**APPLICATION OF LIME ROCK RESOURCES II-A,
L.P. FOR APPROVAL OF COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

Case No. 14,820

**APPLICATION OF LIME ROCK RESOURCES II-A,
L.P. FOR APPROVAL OF COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

Case No. 14,821

**APPLICATION OF LIME ROCK RESOURCES II-A,
L.P. FOR APPROVAL OF COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

Case No. 14,822

**APPLICATION OF LIME ROCK RESOURCES II-A,
L.P. FOR APPROVAL OF COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

Case No. 14,823

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Lime Rock Resources II-A, L.P.

APPLICANT'S ATTORNEY

Ernest L. Padilla

OPPONENT

Mewbourne Oil Company
Suite 1020
500 West Texas
Midland, Texas 79701

OPPONENT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attention: Corey Mitchell
(432) 682-3715

STATEMENT OF THE CASE

APPLICANT

OPPONENT

Applicant seeks to, collectively, force pool the E $\frac{1}{2}$ SW $\frac{1}{4}$ of Section 7, Township 18 South, Range 27 East, N.M.P.M., Eddy County, New Mexico, to be dedicated to four Yeso wells.

Mewbourne is the operator of the S $\frac{1}{2}$ of Section 7 under an Operating Agreement dated May 15, 1973. This agreement covers all depths in the S $\frac{1}{2}$ of Section 7 except (1) the Queen-Grayburg-San Andres formation in the E $\frac{1}{2}$ SW $\frac{1}{4}$ and NE $\frac{1}{4}$ SE $\frac{1}{4}$ of Section 7, (2) surface to 1910 feet subsurface in the NW $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 7, (3) surface to the base of the San Andres formation in the W $\frac{1}{2}$ SE $\frac{1}{4}$ of Section 7, and (4) surface to 1900 feet subsurface in the SW $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 7. All of the above excluded depths are above the top of the Yeso formation. Thus, there is a voluntary agreement between the working interest owners in the proposed wells, and the cases must be dismissed.

PROPOSED EVIDENCE

APPLICANT

Mewbourne may present the following witness:

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Corey Mitchell (landman)	20 min.	Approx. 6

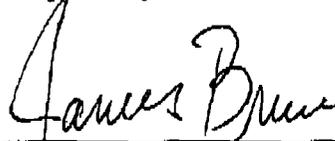
OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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PROCEDURAL MATTERS

Mewbourne will be filing a motion to dismiss, which Mewbourne requests to be heard before the cases are presented.

Respectfully submitted,



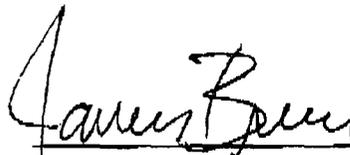
James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

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 19th day of April, 2012 by facsimile transmission and U.S. Mail:

Ernest L. Padilla
P.O. Box 2523
Santa Fe, New Mexico 87504
(505) 988-7592


James Bruce