

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

APPLICATION OF MEWBOURNE OIL COMPANY
FOR A NONSTANDARD GAS SPACING AND
PRORATION UNIT AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO

Case No. 16234

JUN 21 2018 PM04:31

PRE-HEARING STATEMENT

TOM M. RAGSDALE, provisionally provides this Pre-Hearing Statement as required by
the rules of the Division.

APPEARANCES

TOM M. RAGSDALE

TOM M. RAGSDALE'S ATTORNEY:

Sharon T. Shaheen, Esq.
Montgomery & Andrews, P.A.
P.O. Box 2307
Santa Fe, NM 87504-2307
Telephone: (505) 982-3873
Email: sshaheen@montand.com

APPLICANT

APPLICANT'S ATTORNEY:

MEWBOURNE OIL COMPANY

James G. Bruce, Esq.
P.O. Box 1056
Santa Fe, NM 87504
Telephone: (505) 982-2043
Email: jamesbruc@aol.com

COG OPERATING, LLC

Ocean Munds-Dry, Esq.
William F. Carr, Esq.
Elizabeth A. Ryan, Esq.
1048 Paseo de Peralta
Santa Fe, NM 87501
Telephone: (505) 780-8000
Email: omundsdry@concho.com
wcarr@concho.com
eryan@concho.com

MARATHON OIL PERMIAN, LLC

Earl E. Debrine, Jr.
Jennifer L. Bradfute
Modrall Sperling Roehl Harris & Sisk, P.A.
P.O. Box 2168
Bank of America Centre
500 Fourth St., NW – Suite 1000
Albuquerque, NM 87103-2168
Telephone: (505) 848-1800
Email: edebrine@modrall.com
jennifer.bradfute@modrall.com

STATEMENT OF THE CASE

Applicant Mewbourne Oil Company seeks approval to institute (i) approving a non-standard spacing and proration unit in the Wolfcamp formation comprised of the NE/4 of Section 21 and the E/2 of Section 16, Township 24 South, Range 28 East, N.M.P.M., Eddy County, New Mexico, and (ii) pooling all mineral interests in the Wolfcamp formation underlying the non-standard unit. Tom M. Ragsdale owns interest in the proposed unit.

PROPOSED EVIDENCE

OPPONENT: TOM M. RAGSDALE

WITNESSES: Karen Stanford

EST. TIME: 1 HOUR

EXHIBITS: 6

APPLICANT: MEWBOURNE OIL COMPANY

WITNESSES:

EST. TIME:

EXHIBITS:

PROCEDURAL MATTERS

None.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: Sharon T. Shaheen

Sharon T. Shaheen

P.O. Box 2307

Santa Fe, New Mexico 87504-2307

Telephone: (505) 982-3873

Email: sshaheen@montand.com

Attorney for Tom M. Ragsdale

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of June, 2018, a true copy of the foregoing pleading was served via email to counsel of record as follows:

James G. Bruce, Esq.
P.O. Box 1056
Santa Fe, NM 87504
Telephone: (505) 982-2043
Email: jamesbruc@aol.com

*Attorney for Applicant Mewbourne Oil
Company*

Ocean Munds-Dry, Esq.
William F. Carr, Esq.
Elizabeth A. Ryan, Esq.
1048 Paseo de Peralta
Santa Fe, NM 87501
Telephone: (505) 780-8000
Email: omundsdry@concho.com
wcarr@concho.com
eryan@concho.com

Attorneys for COG Operating LLC

Earl E. Debrine, Jr.
Jennifer L. Bradfute
Modrall Sperling Roehl Harris & Sisk, P.A.
P.O. Box 2168
Bank of America Centre
500 Fourth St., NW – Suite 1000
Albuquerque, NM 87103-2168
Telephone: (505) 848-1800
Email: edebrine@modrall.com
jennifer.bradfute@modrall.com

Attorneys for Marathon Oil Permian LLC

Sharon T. Shaheen
Sharon T. Shaheen