

**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 MARBOB ENERGY CORPORATION  
FOR VERTICAL EXPANSION OF THE BURCH KEELY UNIT,  
EDDY COUNTY, NEW MEXICO.**

CASE NO. 14558

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**PRE- HEARING STATEMENT**

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Dean Chumbley  
Land Manager  
Marbob Energy Corporation  
324 W. Main Street, #103  
Artesia, NM 88211-0227  
(505) 748-3303

**ATTORNEY**

Ocean Munds-Dry, Esq.  
Holland & Hart LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421

**STATEMENT OF CASE**

**APPLICANT**

Applicant in the above-styled cause seeks an order amending Order No. R-7900-A to extend the vertical limits in the Burch Keely Unit to expand the Unitized Formation to 5000 feet. The Unit Area consists of lands in Sections 12, 13, 23 through 26 in Township 17 south, Range 29 East and Sections 18, 19 and 30 in Township 17 South, Range 30 East, NMPM, Eddy county, New Mexico.

**PROPOSED EVIDENCE**

**WITNESSES**

**ESTIMATED TIME**

**EXHIBITS**

Dean Chumbley  
Landman

10 minutes

Approximately  
4 Exhibits

Mark Ashley  
Geologist

15 minutes

Approximately  
3 Exhibits

Ken Craig  
Engineer

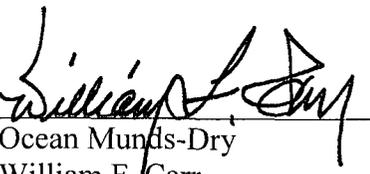
10 minutes

Approximately  
3 Exhibits

**PROCEDURAL MATTERS**

Marbob Energy Corporation, has none at this time.

Respectfully submitted,  
HOLLAND & HART LLP

By:   
Ocean Munds-Dry  
William F. Carr

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**ATTORNEYS FOR  
MARBOb ENERGY CORPORATION**