

**MEWBOURNE OIL COMPANY**

**P. O. BOX 7698**

**TYLER, TEXAS 75711**

**214 - 561-2900**

August 28, 1984

Re: Case No. 8194  
Order No. R-7591  
Application of Don Stuckey for  
Compulsory Pooling, Eddy County, NM

*Case 8369*

Oil Conservation Division  
State Land Office Building, Room 206  
310 Old Santa Fe Trail  
Santa Fe, New Mexico 87501

**RECEIVED**

**AUG 29 1984**

Attention: Mr. Joe D. Ramey  
Director

**OIL CONSERVATION DIVISION**

Gentlemen:

With reference to our telephone conversation this date, I am hereby making a formal request to the Oil Conservation Division to vacate Order No. R-7591 issued in Case No. 8194.

I am making this request on behalf of Mr. Curtis Mewbourne who currently owns an undivided 1.25 net acre leasehold interest in the SW/4 NE/4 of Section 5-20S-25E, Eddy County, New Mexico. Mr. Mewbourne participated in the S.P. Johnson No. 1 well located in the SW/4 NE/4 of Section 5 with a 19.89% cost interest. Mark Production Company (now Mewbourne Oil Company) was designated as operator of the unit for the captioned well under the terms of an Operating Agreement dated July 8, 1974. This operating agreement remains in full force and effect as to various interest in the 40 acre tract subject to the captioned Order.

I have secured a copy of the Transcript of Hearing in Case No. 8194 from the Federal Abstract Office. While reviewing the testimony made by Mr. Stuckey I found several statements concerning the interest of Curtis Mewbourne which are inconsistent with the facts as we understand them.

1) Page 10 of the Transcript: Mr. Stuckey makes the statement that none of the owners in the N/2 of Section 5, the former spacing unit, claim an interest in the plugged and abandoned well bore (S.P. Johnson No. 1 well). This is not true. Curtis Mewbourne currently owns a leasehold interest on which the plugged well is situated and has in no way relinquished his interest in the well bore. As stated above, Mr. Mewbourne paid approximately 19% of the costs associated with the S.P. Johnson well.

2) Page 13 of the Transcript: Mr. Stuckey states that with regard to the various working interest owners in the N/2 of Section 5, all parties with the exception of MGF have committed their interest to the reentry of the well. This is not true. As of this date, neither Curtis Mewbourne or Mewbourne Oil Company have finalized any agreement with Mr. Stuckey regarding the interest owned by Mr. Mewbourne in the N/2 of Section 5. Mr. Mewbourne has not committed his

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interest to the reentry of the subject well.

3) Page 14 of the Transcript: Mr. Stuckey states that "everyone involved except MGF has---has done something, giving me the authority and power to re-enter the wellbore and test the zones that we're talking about". This is not true. As stated above, as of this date we have been unable to finalize an agreement with Mr. Stuckey concerning the leasehold interest owned by Mr. Mewbourne in the subject acreage or Mr. Mewbourne's interest in the S.P. Johnson No. 1 well.

In addition to the above reasons for our request to vacate Order No. R-7591, we are contending that neither Curtis Mewbourne or Mewbourne Oil Company was furnished due notice of the hearing held on May 23, 1984. Neither Mewbourne Oil Company or Curtis Mewbourne has yet to receive a copy of the Order of the Division or any notice that an order has been issued directly from the Oil Conservation Division.

I will look forward to receiving a response from you in the near future.

Yours very truly,



Allen Brinson  
Landman

AB:km

cc/Mr. Don Stuckey  
1125 Via Del Ray  
Mesquite, Texas 75150