

**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

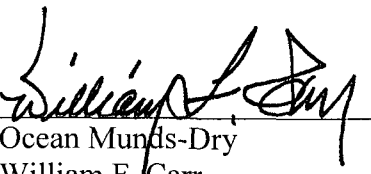
10 minutes

Approximately
3 Exhibits

PROCEDURAL MATTERS

Marbob Energy Corporation, has none at this time.

Respectfully submitted,
HOLLAND & HART LLP

By: 
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**ATTORNEYS FOR
MARBOB ENERGY CORPORATION**