

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 MEWBOURNE OIL COMPANY
FOR AN UNORTHODOX OIL WELL LOCATION,
LEA COUNTY, NEW MEXICO.

Case No. 13172

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

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

Attention: Steve Cobb
(505) 682-3715

APPLICANT'S ATTORNEY

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

OPPONENT

John McDermett

OPPONENT'S ATTORNEY

J. Scott Hall

STATEMENT OF THE CASE

APPLICANT

Applicant seeks authorization to drill and produce its SF "17" Fed. Com. Well No. 2 at an unorthodox oil well location 1910 feet from the south line and 1370 feet from the east line of Section 17, Township 18 South, Range 32 East, N.M.P.M., in the Wolfcamp formation (Undesignated Young-Wolfcamp Pool) and Strawn formation (Undesignated Young-Strawn Pool). The NW¼SE¼ of Section 17 will be dedicated to the well. The well's main objective is the Morrow formation, and the well is orthodox in that zone.

OPPONENT

John McDermett has withdrawn his opposition.

PROPOSED EVIDENCE**APPLICANT**

WITNESSES
Ralph Nelson
(geologist)

EST. TIME
25 min.

EXHIBITS
(a) land plat
(b) Morrow isopach/
structure map
(c) Strawn isopach
(d) cross-section
(e) production plat
(f) topographical
maps
(g) waiver letter
(h) affidavit of
notice

OPPONENT

WITNESSES

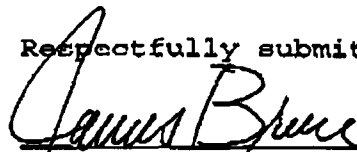
EST. TIME

EXHIBITS

PROCEDURAL MATTERS

-None-

Respectfully submitted,



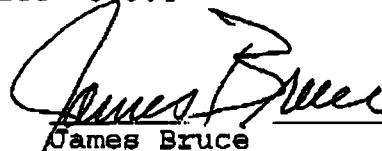
James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Mewbourne Oil Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Pre-Hearing Statement was served via facsimile transmission upon the following counsel of record this 1st day of December, 2003:

J. Scott Hall
Post Office Box 1986
Santa Fe, New Mexico 87504
(505) 989-9857



James Bruce

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

IN THE MATTER OF THE APPLICATION
OF MEWBOURNE OIL COMPANY FOR AN
UNORTHODOX OIL WELL LOCATION,
LEA COUNTY, NEW MEXICO

CASE NO. 13,172

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Miller Stratvert P.A. (J. Scott Hall) on behalf of John McDermett, as required by the Oil Conservation Division.

APPEARANCES

APPLICANT'S ATTORNEY

J. Scott Hall, Esq.
Miller Stratvert P.A.
Post Office Box 1986
Santa Fe, New Mexico 87504-1986
(505) 989-9614

APPLICANT

John McDermett

OPPONENT'S ATTORNEY

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

OPPONENT

Mewbourne Oil Company

STATEMENT OF THE CASE

APPLICANT

Applicant seeks authorization to drill and produce its SF "17" Fed. Com. Well No. 2 at an unorthodox oil well location 1910' FSL and 1370" FEL of Section 17, T-18-S, R-32-E, in the Wolfcamp formation (Undesignated Young-Wolfcamp Pool) and Strawn formation (Undesignated Young-Strawn Pool). The NW/4 SE/4 of Section 17 will be dedicated to the well. The unit is located approximately 7-1/2 miles south-southwest of Maljamar, New Mexico.

WVS
10/31/03

Pre-Hearing Statement
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OPPOSITION OR OTHER PARTY

John McDermett is an overriding royalty interest owner whose participation in production from a well drilled at a standard location will be eliminated and otherwise adversely affected if the proposed unorthodox location is approved. The Applicant has set forth no grounds justifying an exception from the Division's rules and regulations governing well locations.

PROPOSED EVIDENCE

APPLICANT

WITNESSES:	Est. Time	No. of Exhibits
John McDermett/Petroleum Engineering	30 minutes	3

PROCEDURAL MATTERS

Pre-Hearing Statement
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MILLER STRATVERT P.A.

By: T. J. Scott Hall

J. Scott Hall
Attorneys for John McDermott
Post Office Box 1986
Santa Fe, New Mexico 87504-1986
(505) 989-9614

Certificate of Mailing

I hereby certify that a true and correct copy of the foregoing was faxed to counsel of record on the 31st day of October, 2003 as follows:

Will Jones
New Mexico Oil Conservation Division
1220 South St. Francis Drive
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Gail McQuesten
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T. J. Scott Hall
J. Scott Hall

STATE OF NEW MEXICO
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES
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IN THE MATTER OF THE APPLICATION
OF MEWBOURNE OIL COMPANY FOR AN
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LEA COUNTY, NEW MEXICO

CASE NO. 13,172

ENTRY OF APPEARANCE

Comes now JOHN McDERMOTT, by and through his undersigned attorneys, MILLER
STRATVERT P.A., and hereby enters its appearance in the above cause.

MILLER STRATVERT P.A.

By:

J. Scott Hall

J. Scott Hall
Attorneys for John McDermott
Post Office Box 1986
Santa Fe, New Mexico 87504-1986
(505) 989-9614

*WJH
10/27/03*

Certificate of Mailing

I hereby certify that a true and correct copy of the foregoing was faxed to counsel of
record on the 24th day of October, 2003, as follows:

James G. Bruce, Esq.
Post Office Box 1056
Santa Fe, New Mexico 87504-1056

J. Scott Hall
J. Scott Hall