



**MONTGOMERY  
& ANDREWS**  
LAW FIRM

J. SCOTT HALL

Cell: (505) 670-7362

Email: shall@montand.com

Reply To: Santa Fe Office

www.montand.com

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2011 APR 21 P 3: 21

April 21, 2011

Ms. Florene Davidson  
New Mexico Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

**Hand Delivered**

**Re: NMOCD Case No. 14620: Application of Mewbourne Oil Company for  
Approval of a Water Disposal Well, Eddy County, New Mexico**

Dear Ms. Davidson:

On behalf of Nearburg Producing Company, enclosed is an original and one copy  
of a Pre-Hearing Statement in the above-referenced case.

Very truly yours,

Karen Williams  
Assistant to J. Scott Hall

JSH:kw  
Enclosure

00274282

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**REPLY TO:**

325 Paseo de Peralta  
Santa Fe, New Mexico 87501  
Telephone (505) 982-3873 • Fax (505) 982-4289

Post Office Box 2307  
Santa Fe, New Mexico 87504-2307

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6301 Indian School Road NE, Suite 400  
Albuquerque, New Mexico 87110  
Telephone (505) 884-4200 • Fax (505) 888-8929

Post Office Box 36210  
Albuquerque, New Mexico 87176-6210

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

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2011 APR 21 P 3: 21

APPLICATION OF MEWBOURNE OIL COMPANY  
FOR APPROVAL OF A WATER DISPOSAL WELL,  
EDDY COUNTY, NEW MEXICO

CASE NO. 14620

**PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by Nearburg Producing Company as required by the Oil Conservation Division.

**APPEARANCES**

APPLICANT

Mewbourne Oil Company

APPLICANT'S ATTORNEY

James Bruce, Esq.  
P. O. Box 1056  
Santa Fe, NM 87504  
(505) 982-2043

OPPOSING PARTY

Nearburg Producing Company  
3300 North "A" Street  
Building 2, Suite 120  
Midland, TX 79705-5421

OPPOSING PARTY'S ATTORNEY

J. Scott Hall  
Montgomery & Andrews  
P.O. Box 2307  
Santa Fe, NM 87504-2307  
(505) 982-3873

OTHER PARTY

Yates Petroleum Corporation

OTHER PARTY'S ATTORNEY

Gary W. Larson, Esq.  
Hinkel Hensley Shanor & Martin LLP  
P. O. Box 2068  
Santa Fe, NM 87504  
(505) 982-4554

**STATEMENT OF THE CASE**

Applicant seeks an order approving water disposal into the Upper Pennsylvanian Zone (Cisco/Canyon Formation) at a depth of 7685-7765 feet subsurface in the State B Well No. 2, located 660 feet from the north line and 660 feet from the west line of Section 33, Township 19 South, Range 25 East, NMPM.

## NEARBURG PRODUCING COMPANY

Nearburg Producing Company owns oil and gas leasehold interests in the lands that are the subject of the Application. Nearburg opposes the Application for the reason that the proposed injection interval remains capable of producing hydrocarbons.

### PROPOSED EVIDENCE

#### APPLICANT

##### WITNESSES

##### EST. TIME

##### EXHIBITS

#### OPPOSING PARTY

##### WITNESSES

##### EST. TIME

##### EXHIBITS

Russell Wickman, Landman  
Bill Elton, Geologist  
Tim Speer, Petroleum Engineer

30 minutes  
20 minutes  
20 minutes

7  
6  
6

#### OTHER PARTY

##### WITNESSES

##### EST. TIME

##### EXHIBITS

### PROCEDURAL MATTERS

Respectfully submitted,

MONTGOMERY & ANDREWS, P. A.

By: \_\_\_\_\_

J. Scott Hall

P.O. Box 2307  
Santa Fe, NM 87504-2307  
(505) 982-3873 - Telephone  
(505) 982-4289 - Fax

Attorneys for Nearburg Producing Company

**Certificate of Service**

I hereby certify that on April 21, 2011, a true and correct copy of the foregoing was deposited with the U.S. Postal Service, with proper postage affixed, addressed as follows:

Gary W. Larson, Esq.  
Hinkel Hensley Shanor & Martin LLP  
P.O. Box 2068  
Santa Fe, NM 87504-2068

James Bruce, Esq.  
P. O. Box 1056  
Santa Fe, NM 87504



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J. Scott Hall

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