

RECEIVED

JUN 01 1992

KELLAHIN, KELLAHIN AND AUBREY

ATTORNEYS AT LAW

EL PATIO BUILDING

117 NORTH GUADALUPE

POST OFFICE BOX 2265

SANTA FE, NEW MEXICO 87504-2265

W. THOMAS KELLAHIN\*  
KAREN AUBREY\*

\*NEW MEXICO BOARD OF LEGAL SPECIALIZATION  
RECOGNIZED SPECIALIST IN THE AREA OF  
NATURAL RESOURCES-OIL AND GAS LAW  
\*ALSO ADMITTED IN ARIZONA

JASON KELLAHIN (RETIRED 1991)

OIL CONSERVATION DIV  
SANTA FE  
TELEPHONE (505) 982-4285  
TELEFAX (505) 982-2047

*ms.*

June 1, 1992

Mr. Michael E. Stogner  
Chief Hearing Examiner  
Oil Conservation Division  
310 Old Santa Fe Trail  
Room 218  
Santa Fe, New Mexico

HAND DELIVERED

RE: Mewbourne Application  
for Compulsory Pooling,  
N/2 of Section 35, T-17-S,  
R-28-E, NMOCD Case No. 10484

Dear Mr. Stogner:

On behalf of Marathon Oil Company, please enter  
our appearance in the referenced case now set for  
hearing on the Examiner's docket scheduled for June 11,  
1992.

Also enclosed is our prehearing statement.

Very truly yours,



W. Thomas Kellahin

WTK/jcl

Enclosure

xc: with Enclosure  
Thomas Lowry, Esq.  
James Bruce, Esq.

1trt601.092

**RECEIVED**

JUN 01 1992

OIL CONSERVATION DIV  
SANTA FE

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:

CASE NO. 10484

APPLICATION OF MEWBOURNE OIL  
COMPANY FOR COMPULSORY  
POOLING, EDDY COUNTY, NEW MEXICO

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by MARATHON OIL  
COMPANY as required by the Oil Conservation Division.

**APPEARANCE OF PARTIES**

APPLICANT

MEWBOURNE OIL COMPANY

OTHER PARTY

Marathon Oil Company  
P.O. Box 552  
Midland, TX 79702  
ATTN: Thomas Lowry

ATTORNEY

James G. Bruce  
The Hinkle Law Firm  
500 Marquette, NW #800  
Albuquerque, NM 87102

ATTORNEY

W. Thomas Kellahin  
KELLAHIN, KELLAHIN & AUBREY  
P.O. Box 2265  
Santa Fe, NM 87504  
(505) 982-4285

Pre-Hearing Statement  
Case No. 10484  
Page 2

**STATEMENT OF CASE**

APPLICANT

SEE APPLICANT FILING

OPPOSITION OR OTHER PARTY

In order to protect its rights to a DeNovo Hearing, Marathon Oil Company enters its appearance in this matter as one of the parties whose interests the applicant seeks to pool.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

SEE APPLICANT FILING

OPPOSITION OR OTHER PARTY

WITNESSES

EST. TIME

EXHIBITS

NONE AT THIS TIME.

Pre-Hearing Statement  
Case No. 10484  
Page 3

**PROCEDURAL MATTERS**

None at this time.

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin

P.O. Box 2265

Santa Fe, New Mexico 87504

(505) 982-4285

ATTORNEYS FOR OTHER PARTY-  
MARATHON OIL COMPANY

phst601.092

**RECEIVED**

JUN 01 1992

OIL CONSERVATION DIV.  
SANTA FE

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:

CASE NO. 10484

APPLICATION OF MEWBOURNE OIL  
COMPANY FOR COMPULSORY  
POOLING, EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by MARATHON OIL  
COMPANY as required by the Oil Conservation Division.

**APPEARANCE OF PARTIES**

APPLICANT

MEWBOURNE OIL COMPANY

ATTORNEY

James G. Bruce  
The Hinkle Law Firm  
500 Marquette, NW #800  
Albuquerque, NM 87102

OTHER PARTY

Marathon Oil Company  
P.O. Box 552  
Midland, TX 79702  
ATTN: Thomas Lowry

ATTORNEY

W. Thomas Kellahin  
KELLAHIN, KELLAHIN & AUBREY  
P.O. Box 2265  
Santa Fe, NM 87504  
(505) 982-4285

Pre-Hearing Statement  
Case No. 10484  
Page 2

**STATEMENT OF CASE**

APPLICANT

SEE APPLICANT FILING

OPPOSITION OR OTHER PARTY

In order to protect its rights to a DeNovo Hearing, Marathon Oil Company enters its appearance in this matter as one of the parties whose interests the applicant seeks to pool.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
SEE APPLICANT FILING		

OPPOSITION OR OTHER PARTY

WITNESSES	EST. TIME	EXHIBITS
NONE AT THIS TIME.		

Pre-Hearing Statement  
Case No. 10484  
Page 3

**PROCEDURAL MATTERS**

None at this time.

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin

P.O. Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285  
ATTORNEYS FOR OTHER PARTY-  
MARATHON OIL COMPANY

phst601.092

**RECEIVED**

JUN 01 1992

OIL CONSERVATION DIV.  
SANTA FE

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:

CASE NO. 10484

APPLICATION OF MEWBOURNE OIL  
COMPANY FOR COMPULSORY  
POOLING, EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by MARATHON OIL  
COMPANY as required by the Oil Conservation Division.

**APPEARANCE OF PARTIES**

APPLICANT

MEWBOURNE OIL COMPANY

ATTORNEY

James G. Bruce  
The Hinkle Law Firm  
500 Marquette, NW #800  
Albuquerque, NM 87102

OTHER PARTY

Marathon Oil Company  
P.O. Box 552  
Midland, TX 79702  
ATTN: Thomas Lowry

ATTORNEY

W. Thomas Kellahin  
KELLAHIN, KELLAHIN & AUBREY  
P.O. Box 2265  
Santa Fe, NM 87504  
(505) 982-4285



Pre-Hearing Statement  
Case No. 10484  
Page 2

**STATEMENT OF CASE**

APPLICANT

SEE APPLICANT FILING

OPPOSITION OR OTHER PARTY

In order to protect its rights to a DeNovo Hearing, Marathon Oil Company enters its appearance in this matter as one of the parties whose interests the applicant seeks to pool.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
SEE APPLICANT FILING		

OPPOSITION OR OTHER PARTY

WITNESSES	EST. TIME	EXHIBITS
NONE AT THIS TIME.		

Pre-Hearing Statement  
Case No. 10484  
Page 3

**PROCEDURAL MATTERS**

None at this time.

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin

P.O. Box 2265

Santa Fe, New Mexico 87504

(505) 982-4285

ATTORNEYS FOR OTHER PARTY-  
MARATHON OIL COMPANY

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:

CASE NO. 10,484

APPLICATION OF MEWBOURNE OIL  
COMPANY FOR COMPULSORY POOLING  
AND AN UNORTHODOX GAS WELL  
LOCATION, EDDY COUNTY, NEW MEXICO.

RECEIVED

JUL 11 1984

OIL CONSERVATION DIVISION

PRE-HEARING STATEMENT

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

APPEARANCE OF PARTIES

APPLICANT

Mewbourne Oil Company  
500 West Texas  
Suite 1020  
Midland, Texas 79701  
(915) 682-3715  
Attention: D. Paul Haden

ATTORNEY

James Bruce  
Hinkle, Cox, Eaton, Coffield  
& Hensley  
Post Office Box 2068  
Santa Fe, New Mexico 87504-2068  
(505) 982-4554

OPPOSITION OR OTHER PARTY

ATTORNEY

STATEMENT OF CASE

APPLICANT

Applicant seeks to force pool the N½ of Section 35-17 South-28 East. Several lessees have not yet committed their interests to the well. Applicant requests a 200% non-consent penalty against non-consenting lessees, and that operating charges be established. An unorthodox location is requested based on geology.

OPPOSITION OR OTHER PARTY

PROPOSED EVIDENCE

APPLICANT

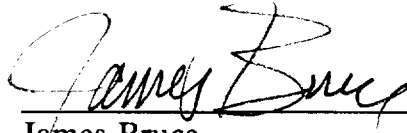
	WITNESSES	EST. TIME		EXHIBITS
1.	D. Paul Haden (Landman)	10 minutes	(a)	Land Plat.
			(b)	Correspondence with parties.
			(c)	Affidavit of Notice.
2.	Dexter Harmon (Geologist)	10 minutes	(a)	Isopachs.
			(b)	Structure map.
			(c)	Cross-section.
			(d)	Production map.

OPPOSITION

PROCEDURAL MATTERS

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD  
& HENSLEY

A handwritten signature in cursive script, appearing to read "James Bruce", is written over a horizontal line.

James Bruce  
Post Office Box 2068  
Santa Fe, New Mexico 87504-2068  
(505) 982-4554

Attorneys for Applicant