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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)

June 4, 1992

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

**HAND DELIVERED**

RECEIVED

JUN 04 1992

OIL CONSERVATION DIVISION

RE: Mewbourne Application  
for Compulsory Pooling,  
N/2 of Section UNKNOWN, T-18-S,  
R-28-E, NMOCD Case No. 10485 \*

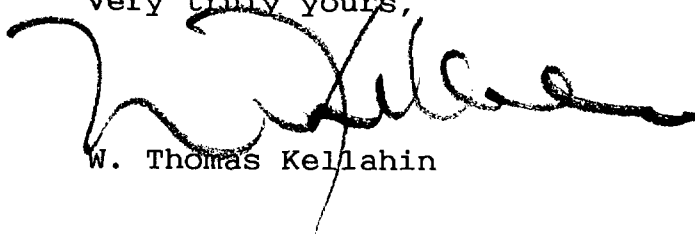
Dear Mr. Stogner:

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.

I bring to your attention that the notice of hearing for this case is defective in that it fails to identify the Section involved. We are guessing that it might be Section 15. In any event Marathon Oil Company hereby enters its appearance if it has an interest which the applicant seeks to pool

In addition, we move that this case be continued and properly advertised. Also, please find enclosed our prehearing statement.

Very truly yours,



W. Thomas Kellahin

WTK/jcl/1trt604.092

Enclosure

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

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

RECEIVED

JUN 04 1992

OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
DIVISION FOR THE PURPOSE OF  
CONSIDERING:

CASE NO. 10485

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. 10485  
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. 10485  
Page 3

**PROCEDURAL MATTERS**

Marathon Oil Company moves that this case be continued and readvertised to cure the defective notice.

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. 10485

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

RECEIVED

JUN 04 1992

OIL CONSERVATION DIVISION

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  
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Pre-Hearing Statement  
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Page 2

**STATEMENT OF CASE**

APPLICANT

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OPPOSITION OR OTHER PARTY

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**PROPOSED EVIDENCE**

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

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OPPOSITION OR OTHER PARTY

WITNESSES

EST. TIME

EXHIBITS

NONE AT THIS TIME.

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Case No. 10485  
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**PROCEDURAL MATTERS**

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By: 

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(505) 982-4285  
ATTORNEYS FOR OTHER PARTY-  
MARATHON OIL COMPANY

RECEIVED

JUN 08 1992

OIL CONSERVATION DIVISION

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: Compulsory Pooling,  
Eddy County, New Mexico

CASE NO. 10485

APPLICATION OF:  
Mewbourne Oil Company

PRE-HEARING STATEMENT

This prehearing statement is submitted by Ernest L. Padilla, Esq. as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Mewbourne Oil Company  
500 W. Texas, Suite 1020  
Midland, Texas 79701  
(915) 682-3715

ATTORNEY

Ernest L. Padilla  
P. O. Box 2523  
Santa Fe, N. M. 87504  
(505) 988-7577

OPPOSITION OR OTHER PARTY

ATTORNEY



STATEMENT OF CASE

APPLICANT

(Concise statement of what is being sought with this application and the reasons therefore.)

Force pooling uncommitted interest owners as to all possible spacing and proration units from the surface to the base of the Morrow Formation underlying W/2 of Section 15, Township 18 South, Range 28 East, Eddy County, New Mexico.

OPPOSITION OR OTHER PARTY

(Concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

Unknown.

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
D. Paul Haden, Petroleum Landman	20 Min.	Land Plat List of Ownership AFE Correspondence Compilation
Dexter Harmon, Geologist	20 Min.	Production Study Cross-Section Structure Map Isopac Map


OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Unknown.		

PROCEDURAL MATTERS

(Identify any procedural matters which  
need to be resolved prior to the hearing.)

None at this time.



Ernest L. Padilla

Hearing Date: June 11, 1992