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. 10874

APPLICATION OF MEWBOURNE OIL COMPANY FOR COMPULSORY POOLING, UNORTHODOX WELL LOCATION, AND NON-STANDARD SPACING UNITS, EDDY COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This Prehearing Statement is submitted by Campbell, Carr, Berge & Sheridan, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT	ATTORNEY	
Mewbourne Oil Company	William F. Carr, Esq Campbell, Carr, Berge & Sheridan, P.A Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421	
OPPOSITION OR OTHER PARTY	ATTORNEY	
name, address, phone and contact person		

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STATEMENT OF CASE

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

Mewbourne Oil Company, applicant in the above-captioned cause, seeks an order pooling all mineral interests from the surface to the base of the Morrow formation underlying the following described areas in Section 19, Township 19 South, Range 29 East, and in the following manner: the W/2 forming a standard 320-acre spacing and proration unit for any and all formations and/or pools developed on 320-acre spacing within said vertical extent, the SW/4 forming a standard 160-acre gas spacing and proration unit for any and all formations and/or pools developed on 160-acre spacing within said vertical extent; the SW/4 SW/4 forming a standard 40-acre oil spacing and proration unit for any and all formations and/or pools developed on 40-acre spacing within said vertical extent. Said unit is to be dedicated to its Parkchester "19" State Well No. 1 to be drilled at an unorthodox location 990 feet from the South line and 740 feet from the West line of said Section 19. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of applicant as the operator of the well and a charge for risk involved in drilling said well.

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Paul Hayden, Landman	10 Min.	Approximately 5
Dexter Harmon, Geologist	10 Min.	Approximately 4

OPPOSITION

WITNESSES	EST. TIME	EXHIBITS
(Name and expertise)		

PROCEDURAL MATTERS

(Please identify any procedural matters which need to be resolved prior to hearing)

Signature