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

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

CASE NO. 10904

APPLICATION OF MARBOB ENERGY CORPORATION FOR AUTHORIZATION OF UNORTHODOX WELL LOCATIONS WITHIN ITS BURCH KEELY UNIT, EDDY COUNTY, NEW MEXICO.

JAN 28 1991

# **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
Marbob Energy Corporation c/o Raye Miller Post Office Drawer 217 Artesia, New Mexico 88211-0217 (505) 748-3303	William F. Carr, Esq Campbell, Carr, Berge & Sheridan, P.A Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421
name, address, phone and contact person	
OPPOSITION OR OTHER PARTY	ATTORNEY
name, address, phone and contact person	

Pre-hearing Statement NMOCD Case No. 10904 Page 2

#### STATEMENT OF CASE

## **APPLICANT**

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

Marbob Energy Corporation, applicant in the above-captioned matter seeks authority to drill producing wells at unorthodox locations within its Burch Keely Unit located in portions of Township 17 South, Ranges 29 and 30 East, provided said locations shall be no closer than 330 feet to the outer boundary of the Unit Area nor closer than 25 feet to any quarter section line or quarter-quarter section line.

## **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.)

Pre-hearing Statement NMOCD Case No. 10904 Page 3

### PROPOSED EVIDENCE

# **APPLICANT**

WITNESSES (Name and expertise)

EST. TIME

**EXHIBITS** 

Raye Miller, Land

5 Min.

Approximately 2

# **OPPOSITION**

WITNESSES (Name and expertise)

EST. TIME

**EXHIBITS** 

# PROCEDURAL MATTERS

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

At the time of hearing we will ask that this case be consolidated with Case 10903.

Signature