

16-23-87

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:

2 1997

APPLICATION OF MEWBOURNE OIL
COMPANY FOR AN UNORTHODOX
GAS WELL LOCATION AND
NON-STANDARD GAS PRORATION UNIT,
EDDY COUNTY, NEW MEXICO.

CASE NO. 11723

APPLICATION OF FASKEN OIL
AND RANCH, LTD. FOR A NON-
STANDARD GAS PRORATION AND
SPACING UNIT AND TWO ALTERNATE
UNORTHODOX GAS WELL LOCATIONS,
EDDY COUNTY, NEW MEXICO.

CASE NO. 11755

11865

APPLICATION OF TEXACO EXPLORATION
& PRODUCTION INC. FOR CLARIFICATION,
OR IN THE ALTERNATIVE, AN EXCEPTION
TO THE SPECIAL POOL RULE AND REGULATIONS
FOR THE CATCLAW-DRAW MORROW GAS POOL,
EDDY COUNTY, NEW MEXICO.

CASE NO. ~~11808~~

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

Mewbourne Oil Company

name, address, phone and
contact person

Fasken Oil and Ranch, Ltd.

name, address, phone and
contact person

ATTORNEY

Jim Bruce, Esq.
Attorney at Law
Post Office Box 1056
Santa Fe, New Mexico 87504-1056
(505) 982-2043

W. Thomas Kellahin, Esq.
Kellahin & Kellahin
Post Office Box 2265
Santa Fe, New Mexico 87504-2265
(505) 982-4285

INTERESTED PARTY

Texaco Exploration & Production Inc.
c/o David Uhl
Post Office Box 2100
Denver, CO 80201
(303) 793-4647

name, address, phone and
contact person

ATTORNEY

William F. Carr, Esq.
Campbell, Carr, Berge & Sheridan, P.A.
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

STATEMENT OF CASE

APPLICANT

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

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.) -

Texaco Exploration & Production Inc., will request that a well at the unorthodox location proposed by Mewbourne be denied or penalized to restrict the production therefrom and thereby offset the advantage Mewbourne will gain by virtue of this location.

Texaco will also seek clarification of the Special Pool Rules and Regulations for the Catclaw Draw-Morrow Gas Pool or, in the alternative, an exception to these rules to permit two wells on Section 12, Township 21 South, Range 25 East to concurrently produce from the Morrow formation.

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

TEXACO EXPLORATION & PRODUCTION INC.

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS -

David Uhl, Geology

20Min.

Approximately 7

Kevin Bittel, Engineer

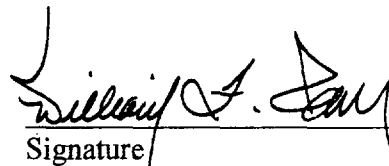
10 Min.

Approximately 2

PROCEDURAL MATTERS

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

Texaco Exploration & Production Inc. will request that Cases 11723, 11755 and 11808 be consolidated for purposes of hearing.


Signature

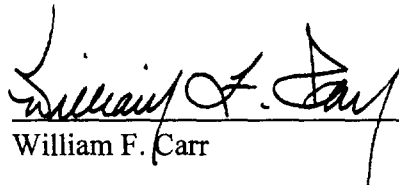
CERTIFICATE OF SERVICE

I hereby certify that I have caused a true and correct copy of the foregoing Pre-Hearing Statement to be hand-delivered on this 23rd day of October, 1997 to the following counsel of record:

Lyn Hebert, Esq.
Oil Conservation Division
New Mexico Energy, Minerals
& Natural Resources
2040 South Pacheco Street
Santa Fe, New Mexico 87505

James E. Bruce, Esq.
Attorney at Law
612 Old Santa Fe Trail
Suite B
Santa Fe, New Mexico 87501

W. Thomas Kellahin, Esq.
Kellahin & Kellahin
117 North Guadalupe Street
Santa Fe, New Mexico 87501


William F. Carr