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

# APPLICATION OF MEWBOURNE OIL COMPANY FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

CASE NOS. 22365-22368

### **CONSOLIDATED PRE-HEARING STATEMENT**

Mewbourne Oil Company ("Applicant") submits its Consolidated Pre-Hearing Statement

pursuant to the rules of the Oil Conservation Division.

## **APPEARANCES**

#### APPLICANT Mewbourne Oil Comr

Mewbourne Oil Company

## ATTORNEYS

Dana S. Hardy Michael Rodriguez P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com mrodriguez@hinklelawfirm.com

## **INTERESTED PARTIES**

COG Operating LLC and Concho Oil & Gas LLC

MRC Permian Company

#### **ATTORNEYS**

Ocean Munds-Dry Elizabeth Ryan ConocoPhillips 1048 Paseo de Peralta Santa Fe, New Mexico 87501 (505) 780-8000 (505) 428-0485 Facsimile Ocean.Munds-Dry@conocophillips.com Beth.Ryan@conocophillips.com

Michael H. Feldewert Adam G. Rankin Julia Broggi Post Office Box 2208 Santa Fe, New Mexico 87504 TEL: (505) 988-4421 FAX: (505) 983-6043 Facsimile mfeldewert@hollandhart.com agrankin@hollandhart.com jbroggi@hollandhart.com

#### STATEMENT OF THE CASE

In **Case No. 22365**, Applicant applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 240-acre, more or less, standard horizontal spacing unit comprised of the E/2E/2 of Section 11 and E/2SE/4 of Section 2, Township 18 South, Range 32 East, Lea County, New Mexico ("Unit"). The Unit will be dedicated to the Dragonstone 11/2 B2PI Fed Com #1 well to be horizontally drilled from a surface hole location in the NE/4NE/4 (Unit A) of Section 14 to a bottom hole location in the NE/4SE/4 (Unit I) of Section 2.

In **Case No. 22366**, Applicant applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 240-acre, more or less, standard horizontal spacing unit comprised of the E/2W/2 of Section 11 and E/2SW/4 of Section 2, Township 18 South, Range 32 East, Lea County, New Mexico ("Unit"). The Unit will be dedicated to the Dragonstone 11/2 B2NK Fed Com #1 well to be horizontally drilled from a surface hole location in the SW/4SW/4 (Unit M) of Section 11 to a bottom hole location in the NE/4SW/4 (Unit K) of Section 2.

In **Case No. 22367**, Applicant applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 240-acre, more or less, standard horizontal spacing unit comprised of the W/2W/2 of Section 11 and W/2SW/4 of Section 2, Township 18 South, Range 32 East, Lea County, New Mexico ("Unit"). The Unit will be dedicated to the Dragonstone 11/2 B2ML Fed Com #1 well to be horizontally drilled from a surface hole location in the SW/4SW/4 (Unit M) of Section 11 to a bottom hole location in the NW/4SW/4 (Unit L) of Section 2.

In **Case No. 22368**, Applicant applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 240-acre, more or less, standard horizontal spacing unit comprised of the W/2E/2 of Section 11 and W/2SE/4 of Section 2, Township 18 South, Range 32 East, Lea County, New Mexico ("Unit"). The Unit will be dedicated to the Dragonstone 11/2 B2OJ Fed Com #1 well to be horizontally drilled from a surface hole location in the NE/4NE/4 (Unit A) of Section 14 to a bottom hole location in the NW/4SE/4 (Unit J) of Section 2.

Also to be considered in these cases will be the cost of drilling and completing the Wells and the allocation of the costs, the designation of Applicant as the operator of the Wells, and a 200% charge for the risk involved in drilling and completing the Wells. The Wells are located approximately 25 miles southwest of Carlsbad, New Mexico.

#### **PROPOSED EVIDENCE**

Witness	Occupation	<b>Estimated</b> Time	Exhibits
Brad Dunn	Landman	Affidavit	Approx. 7
Charles Crosby	Geologist	Affidavit	Approx. 4

#### PROCEDURAL MATTERS

Applicant requests Case Nos. 22365, 22366, 22367 and 22368 be consolidated for hearing.

Applicant will present its case by affidavit if there is no opposition to its application.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

Dana S. Hardy Michael Rodriguez P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com mrodriguez@hinklelawfirm.com *Counsel for Mewbourne Oil Company* 

# **Certificate of Service**

I hereby certify that on February 10, 2022, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Ocean Munds-Dry Elizabeth Ryan Ocean.munds-dry@conocophillips.com Beth.ryan@conocophillips.com *Counsel for COG Operating LLC & Concho Oil & Gas LLC* 

Michael H. Feldewert Adam G. Rankin Julia Broggi mfeldewert@hollandhart.com agrankin@hollandhart.com jbroggi@hollandhart.com *Counsel for MRC Permian Company* 

/s/ Dana S. Hardy

Dana S. Hardy

District I 1625 N. French Dr., Hobbs, NM 88240 Phone:(575) 393-6161 Fax:(575) 393-0720

811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III

1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170 District IV

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone: (505) 476-3470 Fax: (505) 476-3462

# **State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division** 1220 S. St Francis Dr. Santa Fe, NM 87505

QUESTIONS

Page 5 of 5

Action 80717

QUESTIONS

Operator:	OGRID:
Spur Energy Partners LLC	328947
9655 Katy Freeway	Action Number:
Houston, TX 77024	80717
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

#### QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witnesses	Not answered.	
Testimony time (in minutes)	Not answered.	