

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION**APPLICATION OF MEWBOURNE OIL COMPANY
FOR COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO.**

Case No. _____

APPLICATION

Mewbourne Oil Company applies for an order pooling all mineral interests in the Wolfcamp formation in a horizontal spacing unit comprised of Lot 2, the S/2NE/4, and the SE/4NW/4 (the S/2N/2) of Section 31 and the S/2N/2 Section 32, Township 21 South, Range 26 East, N.M.P.M., Eddy County, New Mexico, and in support thereof, states:

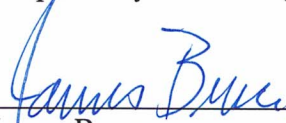
1. Applicant is an interest owner in the S/2N/2 of Section 31 and the S/2N/2 Section 32 (containing 320.84 acres), and has the right to drill a well thereon.
2. Applicant proposes to drill the G W Buffalo Fed Com. Well No. 713H, with a first take point in the SE/4NE/4 of Section 32 and a last take point in Lot 2 of Section 31, and to dedicate the S/2N/2 of Section 31 and the S/2N/2 Section 32 to the well.
3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the S/2N/2 of Section 31 and the S/2N/2 Section 32 for the purposes set forth herein.
4. Although applicant attempted to obtain voluntary agreements from all mineral interest owners to participate in the drilling of the wells or to otherwise commit their interests to the wells, certain interest owners have failed or refused to join in dedicating their interests. Therefore, applicant seeks an order pooling all uncommitted mineral interest owners in the Wolfcamp formation underlying the S/2N/2 of Section 31 and the S/2N/2 Section 32, pursuant to NMSA 1978 §70-2-17.

5. The pooling of all uncommitted mineral interest owners in the Wolfcamp formation underlying the S/2N/2 of Section 31 and the S/2N/2 Section 32 will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

WHEREFORE, applicant requests that, after notice and hearing, the Division enter its order:

- A. Pooling all uncommitted mineral interest owners in the Wolfcamp formation (Avalon; Wolfcamp/Pool Code 171120) underlying the S/2N/2 of Section 31 and the S/2N/2 Section 32;
- B. Designating applicant as operator of the well;
- C. Considering the cost of drilling, completing, testing, and equipping the well, and allocating the cost among the well's working interest owners;
- D. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and
- E. Setting a 200% charge for the risk involved in drilling, completing, testing, and equipping the well in the event a working interest owner elects not to participate in the wells.

Respectfully submitted,



James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Mewbourne Oil Company