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

APPLICATIONS OF MEWBOURNE OIL COMPANY FOR COMPULSORY POOLING AND OVERLAPPING SPACING UNITS, EDDY COUNTY, NEW MEXICO.

CASE NOS. 24979 - 24981

### CONSOLIDATED PRE-HEARING STATEMENT

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

Hearing Statement pursuant to the rules of the Oil Conservation Division ("Division").

#### **APPLICANT** ATTORNEYS

Mewbourne Oil Company Dana S. Hardy

Jaclyn M. McLean Dylan M. Villescas Hinkle Shanor LLP P.O. Box 2068

Santa Fe, NM 87504-2068 Phone: (505) 982-4554 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com dvillescas@hinklelawfirm.com

#### INTERESTED PARTY ATTORNEY

MRC Permian Company Michael H. Feldewert

Adam G. Rankin Paula M. Vance

Post Office Box 2208

Santa Fe, New Mexico 87504

(505) 988-4421

(505) 983-6043 Facsimile mfeldewert@hollandhart.com agrankin@hollandhart.com pmvance@hollandhart.com

#### **STATEMENT OF THE CASES**

In Case No. 24979, Mewbourne applies for an order pooling all uncommitted interests in the Wolfcamp formation underlying a 959.81-acre, more or less, standard, overlapping horizontal spacing unit comprised of the W/2 of Sections 27 and 34, Township 23 South, Range 28 East, and the W/2 of Section 3, Township 24 South, Range 28 East, Eddy County, New Mexico. The unit will be dedicated to the following wells:

- a. **Yardbirds 27/3 Fee 711H**, which will be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 27, Township 23 South, to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 3, Township 24 South; and
- b. Yardbirds 27/3 Fee 713H, which will be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 27, Township 23 South, to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 3, Township 24 South.

The completed intervals of the wells will be orthodox. The unit will partially overlap with the proposed spacing unit for the Yardbirds 27/3 Fee 715H (API No. pending) well, which will be located in Sections 27 and 34, Township 23 2 South, Range 28 East, and Section 3, Township 24 South, Range 28 East, and will produce from the Purple Sage, Wolfcamp (Gas) pool (Code 98220).

In Case No. 24980, Mewbourne applies for an order pooling all uncommitted interests in the Wolfcamp formation underlying a 1,920.06-acre, more or less, standard, overlapping horizontal spacing unit comprised of all of Sections 27 and 34, Township 23 South, Range 28 East, and all of Section 3, Township 24 South, Range 28 East, Eddy County, New Mexico. The unit will be dedicated to the Yardbirds 27/3 Fee 715H well, which will be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 27, Township 23 South, to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 3, Township 24 South. The completed interval of the well

will be orthodox. The completed interval of the well will be located within 330' of the line separating the E/2 and W/2 of Sections 27 and 34, Township 23 South, Range 28 East, and Section 3, Township 24 South, Range 28 East, to allow for the creation of a 1,920.06-acre, more or less, standard horizontal spacing unit. The unit will partially overlap with the proposed spacing units for the following wells, which will produce from the Purple Sage, Wolfcamp (Gas) pool (Code 98220):

- a. Yardbirds 27/3 Fee 711H (API No. pending) and Yardbirds 27/3 Fee 713H (API No. pending), which will be located in the W/2 of Sections 27 and 34, Township 23 South, Range 28 East; and the W/2 of Section 3, Township 24 South, Range 28 East; and
- b. Yardbirds 27/3 Fee 716H (API No. pending), which will be located in the E/2 of Sections 27 and 34, Township 23 South, Range 28 East, and the E/2 of Section 3, Township 24 South, Range 28 East.

In Case No. 24981, Mewbourne applies for an order pooling all uncommitted interests in the Wolfcamp formation underlying a 960.25-acre, more or less, standard, overlapping horizontal spacing unit comprised of the E/2 of Sections 27 and 34, Township 23 South, Range 28 East, and the E/2 of Section 3, Township 24 South, Range 28 East, Eddy County, New Mexico. The unit will be dedicated to the Yardbirds 27/3 Fee 716H well, which will be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 27, Township 23 South, to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 3, Township 24 South. The completed interval of the well will be orthodox. The unit will partially overlap with the proposed spacing unit for the Yardbirds 27/3 Fee 715H (API No. pending) well, which will be located in Sections 27 and 34, Township 23 South, Range 28 East, and Section 3, Township 24 South, Range 28 East, and will produce from the Purple Sage, Wolfcamp (Gas) pool (Code 98220).

Also to be considered will be the cost of drilling and completing the wells and the allocation of the costs, the designation of Applicant as operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells. The wells are located approximately one mile east of Loving, New Mexico.

# PROPOSED EVIDENCE

Witness	Occupation	<b>Estimated Time</b>	<b>Exhibits</b>	
Mitch Robb	Landman	Affidavit	Approx. 5	
Tyler Hill	Geologist	Affidavit	Approx. 3	

## PROCEDURAL MATTERS

Applicant intends to consolidate these cases for hearing and will present the cases by affidavit if there is no opposition to its applications.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

Dana S. Hardy

Jaclyn M. McLean

Dylan M. Villescas

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623

dhardy@hinklelawfirm.com

jmclean@hinklelawfirm.com

dvillescas@hinklelawfirm.com

Counsel for Mewbourne Oil Company

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Prehearing Statement was sent to the following counsel of record on this 27<sup>th</sup> day of November, 2024.

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com
pmvance@hollandhart.com
Attorneys for MRC Permian Company

/s/ Dana S. Hardy

Sante Fe Main Office Phone: (505) 476-3441

General Information Phone: (505) 629-6116

Online Phone Directory https://www.emnrd.nm.gov/ocd/contact-us

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

QUESTIONS

Action 406971

**QUESTIONS** 

Operator:	OGRID:
MEWBOURNE OIL CO	14744
P.O. Box 5270	Action Number:
Hobbs, NM 88241	406971
	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.		