

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

**APPLICATIONS OF MEWBOURNE OIL
COMPANY FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NOS. 24845-24848

APPLICANT'S CONSOLIDATED PRE-HEARING STATEMENT

Mewbourne Oil Company (OGRID No. 14744), the applicant in the above-referenced cases, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division and the Pre-Hearing Order issued for these matters.

APPEARANCES

APPLICANT

Mewbourne Oil Company

ATTORNEY

Michael H. Feldewert, Esq.
Adam G. Rankin, Esq.
Paula M. Vance, Esq.
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com

OTHER PARTIES

Franklin Mountain 3, LLC

ATTORNEY

Deana Bennett
Earl E. DeBrine, Jr.
Yarithza Peña
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800
deana.bennett@modrall.com
earl.debrine@modrall.com
yarithza.pena@modrall.com

APPLICANT'S STATEMENT OF CASE

In these consolidated cases, Mewbourne seeks orders pooling all uncommitted interests in the Bone Spring formation underlying the Sections 7 and 18, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico, as follows:

- Under Case 24845, Mewbourne seeks pool a standard 315.08-acre horizontal well spacing unit comprised of the Lots 1-4 (W2W2 equivalent) of irregular Sections 7 and 18 to be initially dedicated to the proposed **Goat Rope 7/18 State Com 521H** well to be horizontally drilled from a surface location in the SW4 of Section 6, with a first take point in Lot 1 (NW4NW4 equivalent) of irregular Section 7 and a last take point in Lot 4 (SW4SW4 equivalent) of irregular Section 18;
- Under Case 24846, Mewbourne seeks pool a standard 320-acre horizontal well spacing unit comprised of the E2W2 of Sections 7 and 18 to be initially dedicated to the proposed **Goat Rope 7/18 State Com 523H** well to be horizontally drilled from a surface location in the SW4 of Section 6, with a first take point in the NE4NW4 (Unit C) of Section 7 and the last take point in the SE4SW4 (Unit N) of Section 18;
- Under Case 24847, Mewbourne seeks pool a standard 320-acre horizontal well spacing unit comprised of the W2E2 of Sections 7 and 18 to be initially dedicated to the proposed **Goat Rope 7/18 State Com 525H** well to be horizontally drilled from a surface location in the SE4 of Section 6, with a first take point in the NW4NE4 (Unit B) of Section 7 and a last take point in the SW4SE4 (Unit O) of Section 18; and

- Under Case 24848, Mewbourne seeks pool a standard 320-acre horizontal well spacing unit comprised of the E2E2 of Sections 7 and 18 to be initially dedicated to the proposed **Goat Rope 7/18 State Com 527H** well to be horizontally drilled from a surface location in the SE4 of Section 6, with a first take point in the NE4NE4 (Unit A) of Section 7 and a last take point in the SE4SE4 (Unit P) of Section 18.

Mewbourne has sought but been unable to obtain voluntary agreement for the development of these lands from all mineral interest owners in the subject acreage.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Hudson Brunson, Landman	Self-affirmed Statement	Approx. 4
Charles Crosby, Geologist	Self-affirmed Statement	Approx. 3

PROCEDURAL MATTERS

Since Franklin Mountain has withdrawn its objection to these cases, Mewbourne intends to present these matters by self-affirmed statements. Since the filing of the applications, Mewbourne has changed the surface locations for the proposed wells, but the proposed spacing units remain the same. The letter notifying the working interest owners of this change in surface location is included in the filed hearing packets for each case.

Respectfully submitted,

HOLLAND & HART LLP

A handwritten signature in blue ink, appearing to read "Michael H. Feldewert", is positioned above a horizontal line.

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

ATTORNEYS FOR MEWBOURNE OIL COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on December 10, 2024, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Deana Bennett
Earl E. DeBrine, Jr.
Yarithza Peña
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800
deana.bennett@modrall.com
earl.debrine@modrall.com
yarithza.pena@modrall.com

Attorneys for Franklin Mountain Energy 3, LLC



Michael H. Feldewert

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 410507

QUESTIONS

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 410507
	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.