# 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 ATTORNEY

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# **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:

- <u>Under Case 24845</u>, 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;
- <u>Under Case 24846</u>, 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;
- <u>Under Case 24847</u>, 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** 

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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:

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

QUESTIONS

Action 410510

#### **QUESTIONS**

Operator:	OGRID:
MEWBOURNE OIL CO	14744
P.O. Box 5270	Action Number:
Hobbs, NM 88241	410510
	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.		