

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

**APPLICATIONS OF MEWBOURNE OIL  
COMPANY FOR APPROVAL OF AN  
OVERLAPPING HORIZONTAL WELL  
SPACING UNIT AND COMPULSORY  
POOLING, EDDY COUNTY, NEW MEXICO.**

**CASE NOS. 25141-25144**

**MEWBOURNE'S CONSOLIDATED PRE-HEARING STATEMENT**

Mewbourne Oil Company ("Mewbourne" or "Applicant"), the applicant in the above-referenced cases, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Mewbourne Oil Company  
("Mewbourne")

**ATTORNEY**

Michael H. Feldewert  
Adam G. Rankin  
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**APPLICANT'S STATEMENT OF CASE**

Under these consolidated cases, Mewbourne seeks orders pooling the Bone Spring formation San Lorenzo; Bone Spring [53600] for the referenced acreage, all in Township 25 South, Range 28 East, NMPM, Eddy County, New Mexico, as follows:

- Under **Case No. 25141**, Mewbourne seeks an order (1) approving a 320.62-acre, more or less, overlapping horizontal well spacing unit underlying Lot 4, SE/4 NW/4, and W/2 SW/4 (W/2 W/2 equivalent) of irregular Section 4, and W/2 W/2

of Section 9, and (2) pooling all uncommitted interests in this acreage. Mewbourne seeks to initially dedicate the unit to the proposed **San Lorenzo 9-4 State Com #551H** well to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 9 to a bottom hole location in Lot 4 (NW/4 NW/4 equivalent) of irregular Section 4. This proposed horizontal well spacing unit will overlap the following existing spacing units in the Bone Spring formation:

- 160-acre spacing unit comprised of Lot 4, SW/4 NW/4, and W/2 SW/4 (W/2 W/2 equivalent) of irregular Section 4, T25S-R28E, dedicated to the Odie 4 State 1H (API: 30-015-41311) well currently operated by RAYBAW Operating, LLC; and
  - 160-acre spacing unit comprised of the W/2 W/2 of Section 9, T25S-R28E, dedicated to the San Lorenzo 9 MD Fee 1H (API: 30-015-41305) well currently operated by Mewbourne Oil Company.
- Under **Case No. 25142**, Mewbourne seeks and order (1) approving a 320.50-acre, more or less, overlapping horizontal well spacing unit underlying Lot 3, SW/4 NW/4, and E/2 SW/4 (E/2 W/2 equivalent) of irregular Section 4, and E/2 W/2 of Section 9, and (2) pooling all uncommitted interests in this acreage. Mewbourne seeks to initially dedicate the unit to the proposed **San Lorenzo 9-4 State Com #553H** well to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 9 to a bottom hole location in Lot 3 (NE/4 NW/4 equivalent) of irregular Section 4. This proposed horizontal well spacing unit will overlap the following existing spacing units in the Bone Spring formation:
    - 160-acre spacing unit comprised of Lot 3, SE/4 NW/4, and E/2 SW/4 (E/2 W/2 equivalent) of irregular Section 4, T25S-R28E, dedicated to the Nermal 4 State 1H (API: 30-015-41239) well currently operated by RAYBAW Operating, LLC; and
    - 160-acre spacing unit comprised of the E/2 W/2 of Section 9, T25S-R28E, dedicated to the San Lorenzo 9 NC Fee 1H (API: 30-015-40749) well

currently operated by Mewbourne Oil Company.

- Under **Case No. 25143**, Mewbourne seeks and order (1) approving a 320.38-acre, more or less, overlapping horizontal well spacing unit underlying Lot 2, SW/4 NE/4, and W/2 SE/4 (W/2 E/2 equivalent) of irregular Section 4, and W/2 E/2 of Section 9, and (2) pooling all uncommitted interests in this acreage. Mewbourne seeks to initially dedicate the unit to the proposed **San Lorenzo 9-4 State Com #556H** well to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 9 to a bottom hole location in Lot 2 (NW/4 NE/4 equivalent) of irregular Section 4. This proposed horizontal well spacing unit will overlap the following existing spacing unit in the Bone Spring formation:
  - 160-acre spacing unit comprised of Lot 2, SW/4 NE/4, and W/2 SE/4 (W/2 E/2 equivalent) of irregular Section 4, T25S-R28E, dedicated to the Kayro 4 State 1H (API: 30-015-41292) well currently operated by RAYBAW Operating, LLC.
- Under **Case No. 25144**, Mewbourne seeks (1) approving a 320.26-acre, more or less, overlapping horizontal well spacing unit underlying Lot 1, SE/4 NE/4, and E/2 SE/4 (E/2 E/2 equivalent) of irregular Section 4, and E/2 E/2 of Section 9, and (2) pooling all uncommitted interests in this acreage. Mewbourne seeks to initially dedicate the unit to the proposed **San Lorenzo 9-4 State Com #558H** well to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 9 to a bottom hole location in Lot 1 (NE/4 NE/4 equivalent) of irregular Section 4. This proposed horizontal well spacing unit will overlap the following existing spacing unit in the Bone Spring formation:
  - 160-acre spacing unit comprised of Lot 1, SE/4 NE/4, and E/2 SE/4 (E/2 E/2 equivalent) of irregular Section 4, T25S-R28E, dedicated to the Pooky 4 State 1H (API: 30-015-41241) well currently operated by RAYBAW

Operating, LLC.

The completed interval for each well will comply with statewide setbacks for oil wells. 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**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Carson Cullen, Landman	Self-Affirmed Statement	Approx. 5
Cole Hatchel, Geologist	Self-Affirmed Statement	Approx. 3

**PROCEDURAL MATTERS**

Mewbourne requests that these matters be consolidated for hearing and intends to present these cases by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP



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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 429451

QUESTIONS

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 429451
	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.