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

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

CASE NOS. 25149-25150

### MEWBOURNE'S CONSOLIDATED PRE-HEARING STATEMENT

Mewbourne Oil Company ("Mewbourne" or "Applicant") submits this consolidated Pre-

Hearing Statement pursuant to the rules of the Oil Conservation Division.

## **APPEARANCES**

APPLICANT	ATTORNEY

Mewbourne Oil Company Michael H. Feldewert ("Mewbourne") Adam G. Rankin

Paula M. Vance Holland & Hart LLP Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

#### **OTHER PARTIES**

Burlington Resources Elizabeth A. Ryan
Oil & Gas. I.P. ("Burlington") Keri I. Hatley

Oil & Gas, LP ("Burlington") Keri L. Hatley
ConocoPhillips

1048 Paseo de Peralta

Santa Fe, New Mexico 87501

(505) 780-8000

Magnum Hunter Production, Inc.

Oarin C. Savage

("Magnum")

William E. Zimsky

Andrew D. Schill

214 McKenzie Street

Santa Fe, New Mexico 87501 Telephone: 970.385.4401 Facsimile: 970.385.4901

#### **APPLICANT'S STATEMENT OF THE CASE**

Under consolidated cases, Mewbourne seeks orders pooling all uncommitted interests in the Bone Spring formation (Palmillo East; Bone Spring [49553]) in the following proposed horizontal well spacing units underlying Sections 19 and 20, Township 18 South, Range 29 East, NMPM, Eddy County, New Mexico, as follows:

- Under Case No. 25149, Mewbourne seeks to pool a standard 311.30-acre horizontal well spacing unit comprised of Lot 1, NE/4 NW/4, and N/2 NE/4 (N/2 N/2 equivalent) of irregular Section 19, and the N/2 N/2 of Section 20 to be initially dedicated to the proposed Pretty Bird 20/19 Fed Com #611H well to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 20, a first take point in the NE/4 NE/4 (Unit A) of Section 20 and a last take point in the Lot 1 (NW/4 NW/4 equivalent) of irregular Section 19; and
- Under Case No. 25150, Mewbourne seeks to pool a standard 311.45-acre horizontal well spacing unit comprised of Lot 2, SE/4 NW/4, and the S/2 NE/4 (S/2 N/2 equivalent) of irregular Section 19, and the S/2 N/2 of Section 20 to be initially dedicated to the proposed Pretty Bird 20/19 Fed Com #614H well to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 20, a first take point in SE/4 NE/4 (Unit H) of Section 20 and a last take point in the SW/4 NW/4 (Unit E) of irregular Section 19.

The completed interval for the wells 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 interest owners in the subject spacing units.

## APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brock Dixon, Landman	Self-Affirmed Statement	Approx. 4
Justin Roeder, Geologist	Self-Affirmed Statement	Approx. 3

## **PROCEDURAL MATTERS**

Mewbourne does not anticipate opposition to these matters and requests that they be consolidated for a hearing by self-affirmed statements.

Respectfully submitted,

**HOLLAND & HART LLP** 

Bv:

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

ATTORNEYS FOR MEWBOURNE OIL COMPANY

#### **CERTIFICATE OF SERVICE**

I hereby certify that on March 6, 2025, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Elizabeth Ryan
Keri L. Hatley
ConocoPhillips
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000
beth.ryan@conocophillips.com
keri.hatley@conocophillips.com

# Attorneys for ConocoPhillips

Darin C. Savage
William E. Zimsky
Andrew D. Schill
214 McKenzie Street
Santa Fe, New Mexico 87501
Telephone: 970.385.4401
Facsimile: 970.385.4901
darin@abadieschill.com
andrew@abadieschill.com
bill@abadieschill.com

Attorneys for Magnum Hunter Production, Inc.

Paula M. Vance

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 439853

#### **QUESTIONS**

ı	Operator:	OGRID:
ı	MEWBOURNE OIL CO	14744
ı	P.O. Box 5270	Action Number:
ı	Hobbs, NM 88241	439853
ı		Action Type:
ı		[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.	