# 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. 25288-25289

# MEWBOURNE'S CONSOLIDATED PRE-HEARING STATEMENT

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

# **APPEARANCES**

## **APPLICANT**

#### **ATTORNEY**

Mewbourne Oil Company ("Mewbourne")

Michael H. Feldewert 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

## APPLICANT'S STATEMENT OF THE CASE

Under Case No. 25288, Mewbourne seeks an order pooling all uncommitted interests in a non-standard 1,920-acre, more or less, horizontal well spacing unit in the Bone Spring formation (PEARL; Bone Spring, EAST [49690]) underlying All of Sections 8, 17, and 20, Township 19 South, Range 36 East, NMPM, Lea County, New Mexico. Mewbourne seeks to initially dedicate the unit to the proposed **High Sea 8/20 Fed Com #522H** well, with a surface location in the SW/4 SE/4 (Unit O) of Section 5 and a bottom hole location in the SW/4 SW/4 (Unit M) of Section 20; **High Sea 8/20 Fed Com #524H** well, with a surface location in the SW/4 SE/4 (Unit O) of Section

5 and a bottom hole location in the SE/4 SW/4 (Unit N) of Section 20; **High Sea 8/20 Fed Com #526H** well, with a surface location in the SW/4 SE/4 (Unit O) of Section 5 and a bottom hole location in the SW/4 SE/4 (Unit O) of Section 20; and **High Sea 8/20 Fed Com #528H** well, with a surface location in the SW/4 SE/4 (Unit O) of Section 5 and a bottom hole location in the SE/4 SE/4 (Unit P) of Section 20.

Under Case No. 25289, Mewbourne seeks an order pooling all uncommitted interests in a non-standard 1,921.96-acre, more or less, horizontal well spacing unit in the Bone Spring formation (WC-025 G-07 S193513B; Bone Spring [97926]) underlying Lots 1-4, the S/2 N/2 and S/2 (All equivalent) of irregular Section 5, Township 19 South, Range 36 East, and All of Sections 29 and 32, Township 18 South, Range 36 East, NMPM, Lea County, New Mexico. Mewbourne seeks to initially dedicate the unit to the proposed Worlds End 5/29 State Com #522H well, with a surface location in the SW/4 SE/4 (Unit O) of irregular Section 5, T19S-R36E, and a bottom hole location in the NW/4 NW/4 (Unit D) of Section 29, T18S-R36E; Worlds End 5/29 State Com #524H well, with a surface location in the SW/4 SE/4 (Unit O) of irregular Section 5, T19S-R36E, and a bottom hole location in the NE/4 NW/4 (Unit C) of Section 29, T18S-R36E; Worlds End 5/29 State Com #526H well, with a surface location in the SW/4 SE/4 (Unit O) of irregular Section 5, T19S-R36E, and a bottom hole location in the NW/4 NE/4 (Unit B) of Section 29, T18S-R36E; and Worlds End 5/29 State Com #528H well, with a surface location in the SW/4 SE/4 (Unit O) of irregular Section 5, T19SR36E, and a bottom hole location in the NE/4 NE/4 (Unit A) of Section 29, T18S-R36E.

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

Mewbourne will file separately for administrative approval of the non-standard horizontal spacing

unit. 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
Peyton Warren, Landman	Self-Affirmed Statement	Approx. 4
Charles Crosby, 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** 

Ву: \_\_\_\_\_

Michael H. Feldewert

Adam G. Rankin Paula M. Vance

Post Office Box 2208

Santa Fe, NM 87504

505-998-4421

505-983-6043 Facsimile

mfeldewert@hollandhart.com

agrankin@hollandhart.com

pmvance@hollandhart.com

ATTORNEYS FOR MEWBOURNE OIL COMPANY

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 448636

## **QUESTIONS**

Operator:	OGRID:
MEWBOURNE OIL CO	14744
P.O. Box 5270	Action Number:
Hobbs, NM 88241	448636
	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.		