## 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. 25424-25425

# MEWBOURNE'S CONSOLIDATED PRE-HEARING STATEMENT

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

ATTORNEY

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

# **APPEARANCES**

# APPLICANT

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 these consolidated cases, Mewbourne seeks orders pooling for the referenced acreage, all in Township 18 South, Range 35 East, NMPM, Lea County, New Mexico, in the Bone Spring formation (Reeves; Bone Spring [51870]) as follows:

In Case No. 25424, Mewbourne seeks an order pooling all uncommitted interest owners in a standard 320-acre, more or less, well spacing unit underlying the W/2 W/2 of Sections 14 and 23, and to initially dedicate the above-referenced horizontal spacing unit to the proposed Picanha 23/14 State Com 521H well, to be drilled

from a surface hole location and first take point in the SW/4 SW/4 (Unit M) of Section 23, to a last take point in the NW/4 NW/4 (Unit D) of Section 14; and

In Case No. 25425, Mewbourne seeks an order pooling all uncommitted interest owners in a standard 320-acre, more or less, well spacing unit underlying the E/2 W/2 of Sections 14 and 23, and to initially dedicate the above-referenced horizontal spacing unit to the proposed Picanha 23/14 State Com 523H well, to be drilled from a surface hole location in the SW/4 SW/4 (Unit M) of Section 23, a first take point in the SE/4 SW/4 (Unit N), and to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 14.

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. The pooling of uncommitted interest owners in the proposed spacing unit will allow Applicant to obtain a just and fair share of the oil and gas underlying the subject lands, avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.

#### APPLICANT'S PROPOSED EVIDENCE

| WITNESS<br>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

By:

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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

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Action 481670

| QUESTIONS        |  |  |
|------------------|--|--|
| Operator:        | OGRID:   |  |
| MEWBOURNE OIL CO | 14744  |  |
| P.O. Box 5270    | Action Number:   |  |
| Hobbs, NM 88241  | 481670   |  |
|                  | Action Type:<br>[HEAR] Prehearing Statement (PREHEARING) |  |

QUESTIONS

| ľ | Testimony   |               |  |
|---|---|---------------|--|
|   | Please assist us by provide the following information about your testimony. |               |  |
| ſ | Number of witnesses   | Not answered. |  |
|   | Testimony time (in minutes)   | Not answered. |  |