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

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

**CASE NO. 25634** 

### **AMENDED PRE-HEARING STATEMENT**

Mewbourne Oil Company ("Applicant") submits its Amended Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPLICANT ATTORNEYS

Mewbourne Oil Company

Dana S. Hardy

Jaclyn M. McLean

Yarithza Peña

HARDY MCLEAN LLC 125 Lincoln Ave, Ste. 223 Santa Fe, NM 87501

Phone: (505) 230-4410 dhardy@hardymclean.com jmclean@hardymclean.com ypena@hardymclean.com

INTERESTED PARTY ATTORNEYS

Avant Operating II, LLC Deana M. Bennett Earl E. DeBrine, Jr.

MODRALL, SPERLING, ROEHL,

HARRIS & SISK, P.A. Post Office Box 2168

500 Fourth Street NW, Suite 1000 Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800 deana.bennett@modrall.com earl.debrine@modrall.com

Marathon Oil Permian LLC 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

#### STATEMENT OF THE CASE

Applicant applies for an order pooling all uncommitted interests in the Second Bone Spring interval of the Bone Spring formation underlying an 876.42-acre, more or less, non-standard horizonal spacing unit comprised of the N/2 of Section 19, Township 18 South, Range 30 East, the N/2 of Section 24, Township 18 South, Range 29 East, and the N/2 of Section 23, excluding the E/2 NE/4, Township 18 South, Range 29 East, Eddy County, New Mexico. The Unit will be dedicated to the following wells ("Wells"): **IOU 19/23 Fed Com #521H**, which will be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 20, Township 18 South, Range 30 East, to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 23, Township 18 South, Range 29 East; and **IOU 19/23 Fed Com #523H**, which will be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 20, Township 18 South, Range 29 East, to a bottom hole location in the SW/4 NW/4 (Unit D) of Section 20, Township 18 South, Range 29 East.

The completed intervals of the Wells will be orthodox. Mewbourne has separately requested administrative approval of the non-standard horizontal spacing unit. The E/2 NE/4 of Section 23, Township 18 South, Range 29 East will not be perforated. Also to be considered will be the cost of drilling and completing the Wells, the allocation of the costs, the designation of Applicant as the operator of the Units and Wells, and a 200% charge for the risk involved in drilling and completing the Wells.

#### PROPOSED EVIDENCE

Witness	Occupation	<b>Estimated Time</b>	<b>Exhibits</b>
Braxton Blandford	Landman	Affidavit	Approx. 5
Charlie Crosby	Geologist	Affidavit	Approx. 3

# **PROCEDURAL MATTERS**

Applicant intends to present this case by affidavit, following the withdrawal of Avant Operating II, LLC's objection in this matter.

Respectfully submitted,

HARDY MCLEAN LLC

/s/ Dana S. Hardy

Dana S. Hardy
Jaclyn M. McLean
Yarithza Peña
125 Lincoln Ave, Ste. 223
Santa Fe, NM 87501
Phone: (505) 230-4410
dhardy@hardymclean.com
jmclean@hardymclean.com
ypena@hardymclean.com
Counsel for Mewbourne Oil Company

# **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record via electronic mail on November 10, 2025:

Deana M. Bennett
Earl E. DeBrine, Jr.
MODRALL, SPERLING,
ROEHL, HARRIS & SISK, P.A.
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800
deana.bennett@modrall.com
earl.debrine@modrall.com
Attorneys for Avant Operating II, LLC

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 Marathon Oil Permian LLC

/s/ Dana S. Hardy
Dana S. Hardy

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 525036

#### **QUESTIONS**

Operator:	OGRID:
MEWBOURNE OIL CO	14744
P.O. Box 5270	Action Number:
Hobbs, NM 88241	525036
	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.	