

**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. 26153-26156**

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

Mewbourne Oil Company, (“Mewbourne” or “Applicant”), the applicant in this case, submits this consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division

**APPEARANCES**

**APPLICANT**

Mewbourne Oil Company

**ATTORNEY**

Adam G. Rankin  
Paula M. Vance  
A. Raylee Starnes  
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 CASES**

Under these consolidated cases, Mewbourne seeks orders pooling in the Bone Spring formation (Bilbrey Basin; Bone Spring [5695]) for the referenced acreage, all in Township 21 South, Range 31 East, NMPM, Eddy County, New Mexico, as follows:

- Under **Case No. 26153**, Mewbourne seeks to pool the uncommitted interest owners in a standard 480-acre, more or less, well spacing unit underlying the E/2 SE/4 of Section 16, E/2 E/2 of Sections 21 and 28, and E/2 NE/4 of Section 33, to be initially dedicated to the proposed **Cousin Eddy Federal Unit Com 78H** well, to be drilled from a surface

- hole location in the SE/4 NE/4 (Unit H) of Section 33, a first take point in the SE/4 NE/4 (Unit H) of Section 33, and a last take point in the NE/4 SE/4 (Unit I) of Section 16.
- Under **Case No. 26154**, Mewbourne seeks to pool the uncommitted interest owners in a standard 480-acre, more or less, well spacing unit underlying the W/2 SE/4 of Section 16, W/2 E/2 of Sections 21 and 28, and W/2 NE/4 of Section 33, to be initially dedicated to the proposed **Cousin Eddy Federal Unit Com 79H** well, to be drilled from a surface hole location in the SE/4 NE/4 (Unit H) of Section 33, a first take point in the SW/4 NE/4 (Unit G) of Section 33, to a last take point in the NW/4 SE/4 (Unit J) of Section 16.
  - Under **Case No. 26155**, Mewbourne seeks to pool the uncommitted interest owners in a standard 480-acre, more or less, well spacing unit underlying the E/2 SW/4 of Section 16, E/2 W/2 of Sections 21 and 28, and E/2 NW/4 of Section 33, to be initially dedicated to the proposed **Cousin Eddy Federal Unit Com 90H** well, to be drilled from a surface hole location in the SE/4 NW/4 (Unit F) of Section 33, a first take point in the SE/4 NW/4 (Unit F) of Section 33, and a last take point in the NE/4 SW/4 (Unit K) of Section 16.
  - Under **Case No. 26156**, Mewbourne seeks to pool the uncommitted interest owners in a standard 480-acre, more or less, well spacing unit underlying the W/2 SW/4 of Section 16, W/2 W/2 of Sections 21 and 28, and W/2 NW/4 of Section 33, to be initially dedicated to the proposed **Cousin Eddy Federal Unit Com 91H** well, to be drilled from a surface hole location in the SE/4 NW/4 (Unit F) of Section 33, a first take point

in the SW/4 NW/4 (Unit E) of Section 33, and a last take point in the NW/4 SW/4 (Unit L) of Section 16.

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**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Adriana Jimenez-Salgado, Landman	Self-Affirmed Statement	Approx. 4
Tyler Hill, 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:  \_\_\_\_\_

Adam G. Rankin  
Paula M. Vance  
A. Raylee Starnes  
Post Office Box 2208  
Santa Fe, NM 87504  
505-988-4421  
505-983-6043 Facsimile  
agrarkin@hollandhart.com  
pmvance@hollandhart.com  
arstarnes@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 598645

**QUESTIONS**

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88240	OGRID: 14744
	Action Number: 598645
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>