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

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF MEWBOURNE OIL COMPANY FOR A NON-STANDARD HORIZONTAL SPACING UNIT ANDCOMPULSORY POOLING, EDDY COUNTY. **NEW MEXICO.**

Case No. 16279

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Mewbourne Oil Company

Suite 1020

500 West Texas

Midland, Texas 79701

Attention:

Paul Haden

(432) 682-3715

OPPONENT

COG Operating LLC

Cimarex Energy Co.

APPLICANT'S ATTORNEY

Santa Fe, New Mexico 87504

OPPONENT'S ATTORNEY Ocean Munds-Dry

James Bruce

P.O. Box 1056

(505) 982-2043

Jennifer L. Bradfute

STATEMENT OF THE CASE

APPLICANT

Mewbourne Oil Company seeks an order approving a 200-acre non-standard horizontal spacing unit in the Second Bone Spring Sand zone of the Bone Spring formation comprised of the SE/4SW/4 and S/2SE/4 of Section 11 and the S/2SW/4 of Section 12, Township 19 South, Range 29 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Second Bone Spring Sand underlying the non-standard unit. The unit will be dedicated to the Sapphire

11/12 B2NN State Com. Well No. 1H, a horizontal well with a surface location in the SE/4SW/4 of Section 11, and a final take point in the SE/4SW/4 of Section 12. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in drilling and completing the wells.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

| | WITNESSES | EST. TIME | EXHIBITS |
|-----------------|-------------------------------|-----------|-----------------|
| | Paul Haden (landman) | 15 min. | Approx. 6 |
| | Jordan Carrell (geologist) | 15 min. | Approx. 4 |
| <u>OPPONENT</u> | | | |
| | WITNESSES | EST. TIME | EXHIBITS |

PROCEDURAL MATTERS

- 1. If there is no opposition, applicant will submit this case by affidavit.
- 2. If the case is presented on August 23rd, another attorney will present the case.

Respectfully submitted,

James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attorney for Mewbourne Oil Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this ______ day of August, 2018 by e-mail:

Ocean Munds-Dry omundsdry@concho.com

Jennifer L. Bradfute jln@modrall.com

James Bruce