

**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 COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO.**

Case No. 20248

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: Corey Mitchell
(432) 682-3715

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Mewbourne Oil Company seeks an order pooling all mineral interests in the Glorieta-Yeso formation in a horizontal spacing unit comprise of the E/2E/2 of Section 34, Township 19 South, Range 25 East, NMPM. The unit will be dedicated to the Lakewood 34 Y2PA Fed. Com. Well No. 1H, a horizontal well a first take point in the SE/4SE/4 and a final take point in the NE/4NE/4 of Section 34. 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 well.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Mitch Robb (landman)	15 min.	Approx. 6
Charlie Crosby (geologist)	15 min.	Approx. 4

OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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PROCEDURAL MATTERS

Respectfully submitted,



James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Mewbourne Oil Company

Cc: Michael Feldewert

**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 PERCUSSION PETROLEUM
OPERATING, LLC FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

Case No. 20190

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Percussion Petroleum Operating, LLC

APPLICANT'S ATTORNEY

Michael Feldewert

OPPONENT

Mewbourne Oil Company

OPPONENT'S ATTORNEY

James Bruce

STATEMENT OF THE CASE

APPLICANT

n Petroleum Operating, LLC seeks an order pooling of all mineral interests in the Yeso formation underlying the E/2E/2 of Section 34, Township 19 South, Range 25 East, NMPM.

OPPONENT

Mewbourne Oil Company has filed a competing application in Case No. 20248. Mewbourne requests that Percussion's application be denied and Mewbourne's application be granted.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENTS

WITNESSES

Mitch Robb
(landman)

EST. TIME

20 min.

EXHIBITS

Approx. 6

Charlie Crosby
(geologist)

20 min.

Approx. 4

OTHER PARTY

PROCEDURAL MATTERS

Respectfully submitted,



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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 28th day of January, 2019 by e-mail:

Michael Feldewert
mfeldewert@hollandhart.com



James Bruce