JAMES BRUCE ATTORNEY AT LAW

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June 10, 2014

Florene Davidson
Oil Conservation Division

1220 South St. Francis Drive Santa Fe, New Mexico 87505

Dear Florene:

Enclosed for filing, on behalf of Mewbourne Oil Company, are an original and one copy of an application for compulsory pooling, *etc.*, together with a proposed advertisement. The advertisement has also been e-mailed to the Division. Please set the application for the July 10, 2014 Examiner hearing. Thank you.

Very truly yours,

James Bruce

Attorney for Mewbourne Oil Company

RECEIVED OCD

2014 JUN 16 P 3:1:

Case 15171

Parties Being Pooled

Mary Jo Dickerson P.O. Box 642 Glenpool, OK 74033

LBD, a Limited Partnership P.O. Box 686 Hobbs, NM 88240

Magdalene P. Panagopoulos and Panagiota P. Panagopoulos 10008 Ranch Hand Ave. Las Vegas, NV 89117

First Federal Savings and Loan Association P.O. Box 1390 Littlefield, TX 79339

Laura Meade 611 N. Mesa Ave. Carlsbad, NM 88203

Estate of Stan Gregory 608 Lakeside Dr. Carlsbad, NM 88220 Attn: Kathy Gregory

Willis A. Paschal Trust No. 1 P.O. Box 98 Luray, KS 67649

Mr. James W. Klipstine and Klipstine & Hanratty 1601 N. Turner, Suite 400 Hobbs, NM 88240

Clarence Ervin and the Estate of Mary I. Ervin 4016 Jones St. Carlsbad, NM 88220

Mr. Kevin Hanratty P.O. Box 1330 Artesia, NM 88211

Mr. Nolan Greak 8008 Slide Road, Suite #33 Lubbock, TX 79424 Mr. Neville Manning 2112 Indiana Lubbock, TX 79410

Wells Fargo Bank, N.A. 2318 W. Pierce St. Carlsbad, NM 88220

Bonnie R. Gregory and Irma J. Gregory 14 Cork St. Alva, FL 33920

Mr. Thomas W. Gregory 1705 Black Gold St., SE Albuquerque, NM 87123

Mr. Pavlos P. Panagopoulos, Panagopoulos Enterprises and Andreas P. Panagopoulos 511 W. Reinken Ave. Belen, NM 87002

Mr. William E. Gregory 11910 Central Ave., SE, Suite B Albuquerque, NM 87123

Virginia Lee Davis address unknown

John Edward Hall, III address unknown

Bertha Lorene Osborn address unknown

Ralph V. Robinson address unknown

Childs & Bishop Law Office, Inc. address unknown

Charles L. Reitenger address unknown

Jonathan D. Knoerdel address unknown

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION RECEIVED OCD

APPLICATION OF MEWBOURNE OIL COMPANY FOR COMPULSORY POOLING AND AN UNORTHODOX GAS WELL LOCATION, EDDY COUNTY, NEW MEXICO.

فمتر

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APPLICATION

Mewbourne Oil Company applies for an order (i) pooling all mineral interests in the Wolfcamp formation underlying the E½ of Section 35, Township 23 South, Range 28 East, N.M.P.M., Eddy County, New Mexico, and (ii) approving an unorthodox gas well location, and in support thereof, states:

- 1. Applicant is an interest owner in the E½ of Section 35, and has the right to drill a well thereon.
- 2. Applicant proposes to drill its Layla 35 W2OB Fee Well No. 3H to a depth sufficient to test the Wolfcamp formation. Applicant seeks to dedicate to the well the E½ of Section 35 to form a standard 320 acre gas spacing and proration unit for all pools or formations developed on 320 acre spacing within that vertical extent (including the South Culebra Bluff-Wolfcamp Gas Pool). The well is a horizontal well, with a surface location 185 feet from the south line and 2435 feet from the east line, and a terminus 330 feet from the north line and 2150 feet from the east line, of Section 35.
- 3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the $E\frac{1}{2}$ of Section 35 for the purposes set forth herein.
- 4. Although applicant attempted to obtain voluntary agreements from all mineral interest owners to participate in the drilling of the well or to otherwise commit their interests to the well, certain interest owners have failed or refused to join in dedicating their interests.

Therefore, applicant seeks an order pooling all mineral interest owners in the E½ of Section 35, pursuant to NMSA 1978 §70-2-17.

5. The pooling of all mineral interests underlying the E½ of Section 35 will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

WHEREFORE, applicant requests that, after notice and hearing, the Division enter its order:

- A. Pooling all mineral interests in the Wolfcamp formation underlying the E½ of Section 35 to form a standard 320 acre oil spacing and proration unit;
- B. Approving an unorthodox gas well location;
- C. Designating applicant as operator of the well;
- D. Considering the cost of drilling and completing the well, and allocating the cost among the well's working interest owners;
- E. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and
- F. Setting a 200% charge for the risk involved in drilling and completing the well in the event a working interest owner elects not to participate in the well.

Respectfully submitted,

James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-204e

Attorney for Mewbourne Oil Company

PROPOSED ADVERTISEMENT

Case No. 15171_:

Application of Mewbourne Oil Company for compulsory pooling and an unorthodox gas well location, Eddy County, New Mexico. Mewbourne Oil Company seeks an order pooling all mineral interests in the Wolfcamp formation underlying the E/2 of Section 35, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico, and approving an unorthodox gas well location in the Wolfcamp formation. The unit will be dedicated to the Layla 35 W2OB Fee Well No. 3H, a horizontal well with a surface location 185 feet from the south line and 2435 feet from the east line, and a terminus 330 feet from the north line and 2150 feet from the east line, of Section 35. 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. The unit is located approximately 3 miles north-northeast of Malaga, New Mexico.