

**JAMES BRUCE**  
ATTORNEY AT LAW

POST OFFICE BOX 1056  
SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213  
SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone)  
(505) 660-6612 (Cell)  
(505) 982-2151 (Fax)

[jamesbruce@aol.com](mailto:jamesbruce@aol.com)

RECEIVED OOD

2016 JUN 22 P 3: 32

June 21, 2016

Case 15515

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 application for compulsory pooling, *etc.*, together with a proposed advertisement. Please set the application for the July 21, 2016 Examiner hearing. Thank you.

Very truly yours,



James Bruce

Attorney for Mewbourne Oil Company

Parties Being Notified

Gene A. & Brenda L. Adams, his wife  
4315 Aledo Oaks Court  
Ft. Worth, Texas 76126

Stephen J. Shook  
4204 Tallowood Drive  
Austin, Texas 78731

Terry L. Shook  
5217 Old Spicewood Springs Rd., #802  
Austin, Texas 78731

G. Michael Shook  
4939 Oak Shadows Drive  
Houston, Texas 77091

D&M Oil Investments, LLC  
550 Forest Bluffs Road  
Aiken, South Carolina 29803

Roden Participants, Ltd.  
2603 Augusta, Suite 740  
Houston, Texas 77057

Roden Exploration Company, Ltd.  
2603 Augusta, Suite 740  
Houston, Texas 77057

Roden Associates, Ltd.  
2603 Augusta, Suite 740  
Houston, Texas 77057

Roden Oil Company  
P.O. Box 10909  
Midland, Texas 79702

EOG Resources, Inc.  
P.O. Box 4362  
Houston, Texas 77210-4362

T. George Wright  
Address Unknown

Charles W. Seltzer, Independent Executor u/w/o Bill Seltzer, Deceased  
Address Unknown

Gary Tucker Pumping Service, Inc.  
2131 Haston Rd.  
Carlsbad, New Mexico 88220

Margaret V. Dowling  
1829 Georgia Street NE  
Albuquerque, New Mexico 87110

Margaret C. Mobley  
Address Unknown

Ethel Jane Reese  
Address Unknown

Mary Jane Jones  
Address Unknown

James S. Witt and wife, Ina L. Witt  
702 N. Canyon Street  
Carlsbad, New Mexico 88220

T.L. Rees, whose wife is Margaret D. Rees  
P.O. Box 1007  
Colorado City, Texas 7912

George O. Stribling, Personal Representative of the Estate of Martha Stribling, Deceased  
6818 Academy Parkway West NE  
Albuquerque, New Mexico 87109

The Trustee of a trust created by Martha Stribling dated 9-24-1996  
P.O. Box 95557  
Albuquerque, New Mexico 87199

T.B. Stribling, III as Successor Trustee of the Martha G. Stribling Irrevocable Trust  
P.O. Box 95557  
Albuquerque, New Mexico 87199

George O. Stribling  
6818 Academy Parkway West NE  
Albuquerque, New Mexico 87109

Martha J. Stribling  
6818 Academy Parkway West NE  
Albuquerque, New Mexico 87109

Thomas B. Stribling, Trustee for Thomas Luke Stribling Trust  
75 Circle Drive NE  
Albuquerque, New Mexico 87122

George O. Stribling, Trustee for Margaret Stribling, Robert Cain and Salem Stribling  
6818 Academy Parkway West NE  
Albuquerque, New Mexico 87109

John D. Stribling  
6818 Academy Parkway West NE  
Albuquerque, New Mexico 87109

Chasity Garza  
1410 E. Broadway  
Brownfield, Texas 79316

Pamela Ray Cummings  
P.O. Box 817  
Panhandle, Texas 797068

Patricia Gae Stamps  
P.O. Box 249  
Panhandle, Texas 79068

The Heirs or Devisees of John W. Osborn, Deceased  
P.O. Box 419  
Tipton, Oklahoma 76570

Geneva Floyd Osborn  
500 N. Broadway  
Tipton, Oklahoma 73570

Joel W. Osborn  
2420 South Joplin Avenue  
Tulsa, Oklahoma 74114

Heather O. Ward  
P.O. Box 538  
Roscoe, Texas 79545

Sue Osborn Powell  
899 Hedgewood Drive  
Georgetown, Texas 78620

Mary Camille Hall  
3812 Tailfeather Drive  
Round Rock, Texas 78681

Irma J. Gregory  
14 Cork Street  
Alva, Florida 33920

Tommy W. Gregory  
1705 Black Gold St., SE  
Albuquerque, New Mexico 87123

Daniel Taschner  
No. 2 Meadowlark Court  
Artesia, New Mexico 88210

Arin Bratcher  
No. 2 Meadowlark Court  
Artesia, New Mexico 88210

William E. Gregory  
11910 Central Ave., SE, Suite B  
Albuquerque, New Mexico 87123

Kathy Gregory  
608 Lakeside Drive  
Carlsbad, New Mexico 88220

Brian McGonagill  
1612 Westridge Road  
Carlsbad, New Mexico 88220

George P. McGonagill  
2610 B Mountain View  
Carlsbad, New Mexico 88220

Cara McGonagill  
611<sup>1/2</sup> N. Mesa  
Carlsbad, New Mexico 88220

Shirley C. McGonagill  
1612 Westridge  
Carlsbad, New Mexico 88220

Ralph V. Robinson  
Address Unknown

Childs & Bishop Law Office, Inc.  
Address Unknown

Klipstine & Hanratty  
1601 N. Turner, Suite 400  
Hobbs, New Mexico 88240

James W. Klipstine, Jr.  
1601 N. Turner, Suite 400  
Hobbs, New Mexico 88240

Latannia Klipstine  
1601 N. Turner, Suite 400  
Hobbs, New Mexico 88240

Kevin J. Hanratty  
1601 N. Turner, Suite 400  
Hobbs, New Mexico 88240

Helen Beeman  
6801 Beckett Road, #134R  
Austin, Texas 78749

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

Virginia Lee Davis  
P.O. Box 1065  
Carlsbad, New Mexico 88221

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

Charles L. Reitenger  
Address Unknown

John Edward Hall, III  
Address Unknown

The Successor of United New Mexico Bank of Carlsbad,  
Wells Fargo Bank, N.A.  
2318 W. Pierce St.  
Carlsbad, New Mexico 88220

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

Jonathan D. Knoerdel  
Address Unknown

Panagopoulos Enterprises, LLC  
511 W. Reinken Ave.  
Belen, New Mexico 87002

Clarence W. Ervin  
4016 Jones Street  
Carlsbad, New Mexico 88220

The Heirs of Devises of Mary I. Ervin  
4016 Jones Street  
Carlsbad, New Mexico 88220

Louis M. (Mickey) Ratliff, Jr.  
8 Firwood Court  
The Hills, Texas 78738

Mary D. Ratliff  
8 Firwood Court  
The Hills, Texas 78738

Nevill Manning  
2112 Indiana  
Lubbock, Texas 79410

Nolan Greak  
8008 Slide Road, Suite #33  
Lubbock, Texas 79424

Seminole Memorial Hospital  
209 NW 8<sup>th</sup> Street  
Seminole, Texas 79360

Andreas P. Panagopoulos  
511 West Reinken Ave.  
Belen, New Mexico 87002

Pavlos P. Panagopoulos  
511 West Reinken Ave.  
Belen, New Mexico 87002

Panagiota P. Panagopoulos Tendall  
10008 Ranch Hand Ave.  
Las Vegas, Nevada 89117

Magdalene (or Magdaline) P. Panagopoulos  
10008 Ranch Hand Ave.  
Las Vegas, Nevada 89117

Peter A. Panagopoulos  
209 W. McKay  
Carlsbad, New Mexico 88220

Tom Stribling, Trustee of the LTS Trust  
P.O. Box 95557  
Albuquerque, New Mexico 87199

M. Craig Beeman  
6801 Beckett Road, #134R  
Austin, Texas 78749

Bonnie R. Gregory  
14 Cork Street  
Carlsbad, New Mexico 88220

Estate of Stanley J. Gregory  
608 Lakeside Dr.  
Carlsbad, New Mexico 88220

Laura Meade  
611 N. Mesa Ave.  
Carlsbad, New Mexico 88220

2016 JUN 22 P 3: 32

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

Case No. 15515

APPLICATION

Mewbourne Oil Company applies for an order pooling all mineral interests in the Wolfcamp formation underlying the W½ of Section 34, Township 23 South, Range 28 East, N.M.P.M., Eddy County, New Mexico, and approving an unorthodox gas well location, and in support thereof, states:

1. Applicant is an interest owner in the W½ of Section 34, and has the right to drill a well thereon.
2. Applicant proposes to drill its Yardbirds 34 W2NC Fee Well No. 1H to a depth sufficient to test the Wolfcamp formation. Applicant seeks to dedicate to the W½ of Section 34 to the well to form a standard 320 acre gas spacing and proration unit, and to pool all interests in the well unit. The well is a horizontal well with a surface location 150 feet from the south line and 2240 feet from the west line, and a terminus 330 feet from the north line and 2240 feet from the west line, of Section 34. The producing interval is unorthodox under the rules governing the South Culebra Bluff-Wolfcamp Gas Pool.
3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the W½ of Section 34 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.

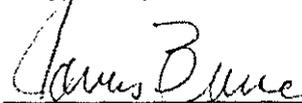
Therefore, applicant seeks an order pooling all mineral interest owners in the W½ of Section 34, pursuant to NMSA 1978 §70-2-17.

5. The pooling of all mineral interests underlying the W½ of Section 34, and approval of the unorthodox well location, 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 W½ of Section 34;
- B. Approving the unorthodox 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) 982-2043

Attorney for Mewbourne Oil Company

PROPOSED ADVERTISEMENT

Case No. 15515:

*Application of Mewbourne Oil Company for compulsory pooling and an unorthodox well location, Eddy County, New Mexico.* Mewbourne Oil Company seeks an order pooling all mineral interests in the Wolfcamp formation underlying the W/2 of Section 34, Township 23 South, Range 28 East, NMPM, to form a standard 320 acre gas spacing and proration unit. The unit will be dedicated to the Yardbirds 34 W2NC Fee Well No. 1H, a horizontal well with a surface location 150 feet from the south line and 2240 feet from the west line, and a terminus 330 feet from the north line and 2240 feet from the west line, of Section 34. The producing interval will be unorthodox. 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 2-1/2 miles north of Malaga, New Mexico.

RECEIVED OGD

2016 JUN 21 P 4: 52