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

APPLICATION OF MEWBOURNE OIL COMPANY  
FOR A NON-STANDARD OIL SPACING AND  
PRORATION UNIT AND COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.

CASE NO. 15601

ENTRY OF APPEARANCE

Montgomery & Andrews, P.A. (J. Scott Hall), enters its appearance as counsel for Black Mountain Operating LLC.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: J. Scott Hall

J. Scott Hall  
Post Office Box 2307  
Santa Fe, New Mexico 87504-2307  
(505) 982-3873  
shall@montand.com

*Attorneys for Black Mountain Operating LLC*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on November 21, 2016:

James Bruce  
Post Office Box 1056  
Santa Fe, NM 87504  
[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

J. Scott Hall  
J. Scott Hall

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**CASE NO. 15601**

**PRE-HEARING STATEMENT**

Black Mountain Operating LLC, ("Black Mountain"), provisionally provides this Pre-Hearing Statement as required by the rules of the Division.

**APPEARANCES**

**OPPONENT: BLACK MOUNTAIN  
OPERATING LLC**

**BLACK MOUNTAIN OPERATING  
LLC'S ATTORNEY**

J. Scott Hall, Esq.  
MONTGOMERY & ANDREWS, P.A.  
P.O. Box 2307  
Santa Fe, NM 87504-2307  
Tele (505) 982-3873  
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**APPLICANT  
MEWBOURNE OIL COMPANY**

**APPLICANT'S ATTORNEY**

James Bruce  
Post Office Box 1056  
Santa Fe, NM 87504  
[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

**STATEMENT OF THE CASE**

Applicant Mewbourne Oil Company seeks an order approving a non-standard oil spacing and proration unit in the Bone Spring formation comprised of the W $\frac{1}{2}$  E $\frac{1}{2}$  of Section 15, Township 23 South, Range 34 East, NMPM, Lea County, New Mexico, and pooling all mineral interests in the Bone Spring formation underlying the non-standard unit.

Black Mountain owns certain working interests in the S/2 of Section 15 that would be included in Mewbourne's proposed spacing and proration unit. Black Mountain plans to develop its acreage with 7,500' laterals to include acreage it owns in Section 10, T23S, R34E. Mewbourne's development plans are in conflict with Black Mountain's plans.

### PROPOSED EVIDENCE

OPPONENT: BLACK MOUNTAIN OPERATING LLC                      EST. TIME                      EXHIBITS

WITNESSES:

Luke Mildren, Land Manager	30 Min.	5
Dr. Michael McCracken, (COO) Reservoir Engineer	45 Min.	5

APPLICANT: MEWBOURNE OIL COMPANY                      EST. TIME                      EXHIBITS

WITNESSES:

### PROCEDURAL MATTERS

Black Mountain has requested a continuance to allow the parties to negotiate a resolution of the conflict.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

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