

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

**APPLICATION OF MEWBOURNE OIL
COMPANY FOR COMPULSORY POOLING,
EDDY AND LEA COUNTIES, NEW MEXICO**

Case No. 20744

AUG 29 2019 AM 10:55

**MEWBOURNE OIL COMPANY'S
PRE-HEARING STATEMENT**

Mewbourne Oil Company ("Mewbourne") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Mewbourne Oil Company

APPLICANT'S ATTORNEYS

Gary W. Larson
Dana S. Hardy
P.O. Box 2068
Santa Fe, NM 87504-2068
Phone: (505) 982-4554
Facsimile: (505) 982-8623
glarson@hinklelawfirm.com
dhardy@hinklelawfirm.com

INTERESTED PARTIES

MRC Delaware Resources, LLC,
MRC Explorers Resources, LLC and
MRC Spiral Resources, LLC

INTERESTED PARTIES' ATTORNEYS

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
P.O. Box 2208
Santa Fe, NM 87504-2208
Phone: (505) 988-4421
Facsimile: (505) 983-6043
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

STATEMENT OF THE CASE

Mewbourne's application seeks an order pooling all uncommitted mineral interests in the Bone Spring formation in a 280.95-acre, more or less, standard horizontal spacing unit comprised of the S/2 NW/4 and SW/4 NE/4 of Section 6, Township 18 South, Range 32 East in Lea County, New Mexico and the S/2 N/2 of Section 1, Township 18 South, Range 31 East in Eddy County, New Mexico.

Mewbourne proposes to dedicate the horizontal spacing unit to the Castle Black 6/1 B2GE Fed Com #1H well, which will be horizontally drilled from a surface location in Unit G in Section 6 to a bottom hole location in Unit E in Section 1. The completed interval for the well will be orthodox.

PROPOSED EVIDENCE

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Mitch Robb (Landman)	10 minutes	Approx. 6
Charles Crosby (Geologist)	10 minutes	Approx. 5

Mewbourne reserves the right to call a rebuttal witness(es) if appropriate.

PROCEDURAL MATTERS

Mewbourne is not aware of any procedural matters to be resolved prior to the hearing. If there is no opposition to its application, Mewbourne will present its case by affidavit.

HINKLE SHANOR, LLP



Gary W. Larson
Dana S. Hardy
P.O. Box 2068
Santa Fe, NM 87504-2068
Phone: (505) 982-4554
Facsimile: (505) 982-8623
glarson@hinklelawfirm.com
dhardy@hinklelawfirm.com

Counsel for Mewbourne Oil Company

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of August 2019, I sent a true and correct copy of Mewbourne Oil Company's Pre-Hearing Statement via email to:

Michael H. Feldewert
Adam G. Rankin
Kaitlyn A. Luck
P.O. Box 2208
Santa Fe, NM 87504-2208
Phone: (505) 988-4421
Facsimile: (505) 983-6043
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
kaluck@hollandhart.com

*Attorneys for MRC Delaware Resources, MRC Explorers
Resources and MRC Spiral Resources*



Gary W. Larson