20679

Summary of Communication with Taylor Family

Case # 15991
Order # R-14757
Compulsory Pooling Application
MOC's Zeppelin 32 W0LI State Com No. 1H (API #30-015-44560)
MOC's Zeppelin 32 W2LI State Com No. 1H (API #30-015-43165)
S/2 Sections 32, T23S, R28E
Lea County, New Mexico

2/20/19:	Paul Haden wrote a letter to each Taylor Family member asking for help
2/20/40	with a title issue present in the family's title.
2/28/19:	Paul Haden of MOC received an email response to letter from Harvey Taylor.
2/28/19:	Paul Haden responded to email from Harvey Taylor.
3/12/19:	Cy Shook emailed Harvey Taylor asking the Taylor family to ratify the
	lease of June Taylor (June's interest is the title issue).
3/12/19:	Harvey Taylor responded to Cy's email stating he needed more time to discuss with his family.
3/21/19:	Cy Shook emailed offer to Harvey Taylor.
3/21/19:	Harvey Taylor returned email stating the offer was "within the realm of
5/21/15.	possibility and asked questions.
3/26/19:	Cy Shook sent email answering questions and increased offer to have
	family ratify June's lease.
3/26/19:	Harvey Taylor emailed Cy Shook with every family member copied on
	the email. Stated "maybe" about the offer to ratify June's lease. Stated
	his lawyer is working on another project. Asked more questions.
4/8/19:	Cy Shook sent email to whole Taylor family. Asked if family had considered offer.
4/8/19:	Harvey Taylor emailed Cy Shook with "maybe" as the answer to the offer.
	Said he is still waiting on counsel.
4/23/19:	Bill G. Taylor, Jr. emailed Cy Shook with all family members copied.
	Asked questions about title problem.
4/24/19:	Discussed title problem with Taylor Family via email.
5/24/19:	Sent well proposals



May 23, 2019

500 W. TEXAS, SUITE 1020 MIDLAND, TEXAS 79701

Via Certified Mail

(432) 682-3715 FAX (432) 685-4170

Harvey R. Taylor 124 South 5th Street Carlsbad, NM 88220

Re.

Well Proposal

Zeppelin 32 W0LI State Com #1H Zeppelin 32 W2LI State Com #2H

Section 32: S2

T-23-S, R-28-E, Lea County, New Mexico

Dear Owner:

Mewbourne Oil Company ("Mewbourne") hereby proposes to drill the two referenced horizontal Wolfcamp Formation wells.

The Zeppelin 32 W0LI State Com #1H will be at a surface location 2030' FSL & 205' FWL and a bottom hole location approximately 2310' FSL & 330' FEL in Section 32, T-23-S, R-28-E, Eddy County, New Mexico. We anticipate drilling to an approximate vertical depth of 9,547' and an approximate measured depth of 14,163'. The estimated cost to casing point for this well is \$2,302,900 and the estimated cost of a producing well is \$6,472,300. These costs are more fully detailed in the AFE enclosed. If successful, the project area for this well will be comprised of the S2 of Section 32.

The Zeppelin 32 W2LI State Com #2H will be at a surface location 1980' FSL & 205' FWL and a bottom hole location approximately 2310' FSL & 331' FEL in Section 32, T-23-S, R-28-E, Eddy County, New Mexico. We anticipate drilling to an approximate vertical depth of 10,480' and an approximate measured depth of 15,050'. The estimated cost to casing point for this well is \$2,334,400 and the estimated cost of a producing well is \$6,215,600. These costs are more fully detailed in the AFE enclosed. If successful, the project area for this well will be comprised of the S2 of Section 32.

Enclosed is an original of Mewbourne's AFE for the well. To make your election to participate in the proposed well, properly execute and return the AFE. As a reminder, Mewbourne's AFEs provide all participants the opportunity to opt out of the "Extra Expense Well Control Insurance" that Mewbourne purchases for each well it drills. If you do opt out, you must provide evidence that you have adequate "Well Control Insurance". Feel free to contact me if you have any questions. I can be reached by phone at (432) 682-3715 or via email at cshook@mewbourne.com.

Sincerely,

MEWBOURNE OIL COMPANY

Cy Shook Landman

y Suk

May 23, 2019

500 W. TEXAS, SUITE 1020 MIDLAND, TEXAS 79701

Via Certified Mail

(432) 682-3715 FAX (432) 685-4170

Marilyn S. Taylor 2310 Ave. B Carlsbad, NM 88220

Re.

Well Proposal

Zeppelin 32 W0LI State Com #1H Zeppelin 32 W2LI State Com #2H

Section 32: S2

T-23-S, R-28-E, Lea County, New Mexico

Dear Owner:

Mewbourne Oil Company ("Mewbourne") hereby proposes to drill the two referenced horizontal Wolfcamp Formation wells.

The Zeppelin 32 W0LI State Com #1H will be at a surface location 2030' FSL & 205' FWL and a bottom hole location approximately 2310' FSL & 330' FEL in Section 32, T-23-S, R-28-E, Eddy County, New Mexico. We anticipate drilling to an approximate vertical depth of 9,547' and an approximate measured depth of 14,163'. The estimated cost to casing point for this well is \$2,302,900 and the estimated cost of a producing well is \$6,472,300. These costs are more fully detailed in the AFE enclosed. If successful, the project area for this well will be comprised of the S2 of Section 32.

The Zeppelin 32 W2LI State Com #2H will be at a surface location 1980' FSL & 205' FWL and a bottom hole location approximately 2310' FSL & 331' FEL in Section 32, T-23-S, R-28-E, Eddy County, New Mexico. We anticipate drilling to an approximate vertical depth of 10,480' and an approximate measured depth of 15,050'. The estimated cost to casing point for this well is \$2,334,400 and the estimated cost of a producing well is \$6,215,600. These costs are more fully detailed in the AFE enclosed. If successful, the project area for this well will be comprised of the S2 of Section 32.

Enclosed is an original of Mewbourne's AFE for the well. To make your election to participate in the proposed well, properly execute and return the AFE. As a reminder, Mewbourne's AFEs provide all participants the opportunity to opt out of the "Extra Expense Well Control Insurance" that Mewbourne purchases for each well it drills. If you do opt out, you must provide evidence that you have adequate "Well Control Insurance". Feel free to contact me if you have any questions. I can be reached by phone at (432) 682-3715 or via email at cshook@mewbourne.com.

Sincerely,

MEWBOURNE OIL COMPANY

Cy Shook Landman

May 23, 2019

500 W. TEXAS, SUITE 1020 MIDLAND, TEXAS 79701

Via Certified Mail

(432) 682-3715 FAX (432) 685-4170

Wanda J. Taylor 1106 North Country Club Cir. Carlsbad, NM 88220

Re:

Well Proposal

Zeppelin 32 W0LI State Com #1H Zeppelin 32 W2LI State Com #2H

Section 32: S2

T-23-S, R-28-E, Lea County, New Mexico

Dear Owner:

Mewbourne Oil Company ("Mewbourne") hereby proposes to drill the two referenced horizontal Wolfcamp Formation wells.

The Zeppelin 32 W0LI State Com #1H will be at a surface location 2030' FSL & 205' FWL and a bottom hole location approximately 2310' FSL & 330' FEL in Section 32, T-23-S, R-28-E, Eddy County, New Mexico. We anticipate drilling to an approximate vertical depth of 9.547' and an approximate measured depth of 14,163'. The estimated cost to casing point for this well is \$2,302,900 and the estimated cost of a producing well is \$6,472,300. These costs are more fully detailed in the AFE enclosed. If successful, the project area for this well will be comprised of the S2 of Section 32.

The Zeppelin 32 W2LI State Com #2H will be at a surface location 1980' FSL & 205' FWL and a bottom hole location approximately 2310' FSL & 331' FEL in Section 32, T-23-S, R-28-E, Eddy County, New Mexico. We anticipate drilling to an approximate vertical depth of 10,480' and an approximate measured depth of 15,050'. The estimated cost to casing point for this well is \$2,334,400 and the estimated cost of a producing well is \$6,215,600. These costs are more fully detailed in the AFE enclosed. If successful, the project area for this well will be comprised of the S2 of Section 32.

Enclosed is an original of Mewbourne's AFE for the well. To make your election to participate in the proposed well, properly execute and return the AFE. As a reminder, Mewbourne's AFEs provide all participants the opportunity to opt out of the "Extra Expense Well Control Insurance" that Mewbourne purchases for each well it drills. If you do opt out, you must provide evidence that you have adequate "Well Control Insurance". Feel free to contact me if you have any questions. I can be reached by phone at (432) 682-3715 or via email at cshook@mewbourne.com.

Sincerely,

MEWBOURNE OIL COMPANY

Cy Shook Landman

May 23, 2019

500 W. TEXAS, SUITE 1020 MIDLAND, TEXAS 79701

Via Certified Mail

(432) 682-3715 FAX (432) 685-4170

Bill G. Taylor, Jr. 199 11th Street Ave. NW Rio Rancho, NM 87144

Re.

Well Proposal

Zeppelin 32 W0LI State Com #1H Zeppelin 32 W2LI State Com #2H

Section 32: S2

T-23-S, R-28-E, Lea County, New Mexico

Dear Owner:

Mewbourne Oil Company ("Mewbourne") hereby proposes to drill the two referenced horizontal Wolfcamp Formation wells.

The Zeppelin 32 W0LI State Com #1H will be at a surface location 2030' FSL & 205' FWL and a bottom hole location approximately 2310' FSL & 330' FEL in Section 32, T-23-S, R-28-E, Eddy County, New Mexico. We anticipate drilling to an approximate vertical depth of 9,547' and an approximate measured depth of 14,163'. The estimated cost to casing point for this well is \$2,302,900 and the estimated cost of a producing well is \$6,472,300. These costs are more fully detailed in the AFE enclosed. If successful, the project area for this well will be comprised of the S2 of Section 32.

The Zeppelin 32 W2LI State Com #2H will be at a surface location 1980' FSL & 205' FWL and a bottom hole location approximately 2310' FSL & 331' FEL in Section 32, T-23-S, R-28-E, Eddy County, New Mexico. We anticipate drilling to an approximate vertical depth of 10,480' and an approximate measured depth of 15,050'. The estimated cost to casing point for this well is \$2,334,400 and the estimated cost of a producing well is \$6,215,600. These costs are more fully detailed in the AFE enclosed. If successful, the project area for this well will be comprised of the S2 of Section 32.

Enclosed is an original of Mewbourne's AFE for the well. To make your election to participate in the proposed well, properly execute and return the AFE. As a reminder, Mewbourne's AFEs provide all participants the opportunity to opt out of the "Extra Expense Well Control Insurance" that Mewbourne purchases for each well it drills. If you do opt out, you must provide evidence that you have adequate "Well Control Insurance". Feel free to contact me if you have any questions. I can be reached by phone at (432) 682-3715 or via email at cshook@mewbourne.com.

Sincerely,

MEWBOURNE OIL COMPANY

Cy Shook Landman

Cydyla

May 23, 2019

500 W. TEXAS, SUITE 1020 MIDLAND, TEXAS 79701

Via Certified Mail

(432) 682-3715 FAX (432) 685-4170

Kathy J. Smith 233 New Mexico Dr. Portales, NM 88130

Well Proposal

Zeppelin 32 W0LI State Com #1H Zeppelin 32 W2LI State Com #2H

Section 32: S2

T-23-S, R-28-E, Lea County, New Mexico

Dear Owner:

Mewbourne Oil Company ("Mewbourne") hereby proposes to drill the two referenced horizontal Wolfcamp Formation wells.

The Zeppelin 32 W0LI State Com #1H will be at a surface location 2030' FSL & 205' FWL and a bottom hole location approximately 2310' FSL & 330' FEL in Section 32, T-23-S, R-28-E, Eddy County, New Mexico. We anticipate drilling to an approximate vertical depth of 9,547' and an approximate measured depth of 14,163'. The estimated cost to casing point for this well is \$2,302,900 and the estimated cost of a producing well is \$6,472,300. These costs are more fully detailed in the AFE enclosed. If successful, the project area for this well will be comprised of the S2 of Section 32.

The Zeppelin 32 W2LI State Com #2H will be at a surface location 1980' FSL & 205' FWL and a bottom hole location approximately 2310' FSL & 331' FEL in Section 32, T-23-S, R-28-E, Eddy County, New Mexico. We anticipate drilling to an approximate vertical depth of 10,480' and an approximate measured depth of 15,050'. The estimated cost to casing point for this well is \$2,334,400 and the estimated cost of a producing well is \$6,215,600. These costs are more fully detailed in the AFE enclosed. If successful, the project area for this well will be comprised of the S2 of Section 32.

Enclosed is an original of Mewbourne's AFE for the well. To make your election to participate in the proposed well, properly execute and return the AFE. As a reminder, Mewbourne's AFEs provide all participants the opportunity to opt out of the "Extra Expense Well Control Insurance" that Mewbourne purchases for each well it drills. If you do opt out, you must provide evidence that you have adequate "Well Control Insurance". Feel free to contact me if you have any questions. I can be reached by phone at (432) 682-3715 or via email at cshook@mewbourne.com.

Sincerely,

MEWBOURNE OIL COMPANY

Cy Shook Landman

y SAK

May 23, 2019

500 W. TEXAS, SUITE 1020 MIDLAND, TEXAS 79701

Via Certified Mail

(432) 682-3715 FAX (432) 685-4170

Carolyn A. Taylor 1702 Curry Rd. Carlsbad, NM 88220

Re.

Well Proposal

Zeppelin 32 W0LI State Com #1H Zeppelin 32 W2LI State Com #2H

Section 32: S2

T-23-S, R-28-E, Lea County, New Mexico

Dear Owner:

Mewbourne Oil Company ("Mewbourne") hereby proposes to drill the two referenced horizontal Wolfcamp Formation wells.

The **Zeppelin 32 W0LI State Com #1H** will be at a surface location 2030' FSL & 205' FWL and a bottom hole location approximately 2310' FSL & 330' FEL in Section 32, T-23-S, R-28-E, Eddy County, New Mexico. We anticipate drilling to an approximate vertical depth of 9,547' and an approximate measured depth of 14,163'. The estimated cost to casing point for this well is \$2,302,900 and the estimated cost of a producing well is \$6,472,300. These costs are more fully detailed in the AFE enclosed. If successful, the project area for this well will be comprised of the S2 of Section 32.

The Zeppelin 32 W2LI State Com #2H will be at a surface location 1980' FSL & 205' FWL and a bottom hole location approximately 2310' FSL & 331' FEL in Section 32, T-23-S, R-28-E, Eddy County, New Mexico. We anticipate drilling to an approximate vertical depth of 10,480' and an approximate measured depth of 15,050'. The estimated cost to casing point for this well is \$2,334,400 and the estimated cost of a producing well is \$6,215,600. These costs are more fully detailed in the AFE enclosed. If successful, the project area for this well will be comprised of the S2 of Section 32.

Enclosed is an original of Mewbourne's AFE for the well. To make your election to participate in the proposed well, properly execute and return the AFE. As a reminder, Mewbourne's AFEs provide all participants the opportunity to opt out of the "Extra Expense Well Control Insurance" that Mewbourne purchases for each well it drills. If you do opt out, you must provide evidence that you have adequate "Well Control Insurance". Feel free to contact me if you have any questions. I can be reached by phone at (432) 682-3715 or via email at cshook@mewbourne.com.

Sincerely,

Juduly

MEWBOURNE OIL COMPANY

Cy Shook Landman

From:

webmaster@simplecertifiedmail.com

Sent:

Friday, May 31, 2019 6:34 PM

To:

Cy Shook

Subject:

Document Delivered

A document with a tracking code of 9414810699945041005889 and reference number of Zeppelin32 WOLI st com 1H Zeppelin 32 st com 2H sec 32 s2 T23S R28 E was successfully delivered to Marilyn S. Taylor.

From:

we bmaster@simple certified mail.com

Sent:

Wednesday, May 29, 2019 5:34 PM

To:

Cy Shook

Subject:

Document Delivered

A document with a tracking code of 9414810699945041005667 and reference number of Zeppelin32 W0Ll st com 1H Zeppelin 32 st com 2H sec 32 s2 T23S R28 E was successfully delivered to Bill G. Taylor Jr..

From:

webmaster@simplecertifiedmail.com

Sent:

Tuesday, May 28, 2019 11:12 PM

To:

Cy Shook

Subject:

Document Delivered

A document with a tracking code of 9414810699945041005759 and reference number of Zeppelin32 W0Ll st com 1H Zeppelin 32 st com 2H sec 32 s2 T23S R28 E was successfully delivered to Wanda J. Taylor.

From:

webmaster@simplecertifiedmail.com

Sent:

Tuesday, May 28, 2019 5:05 PM

To:

Cy Shook

Subject:

Document Delivered

A document with a tracking code of 9414810699945041004011 and reference number of Zeppelin32 W0Ll st com 1H Zeppelin 32 st com 2H sec 32 s2 T23S R28 E was successfully delivered to Carolyn A. Taylor.

From: webmaster@simplecertifiedmail.com

Sent: Tuesday, May 28, 2019 5:05 PM **To:** Cy Shook

Subject: Document Delivered

A document with a tracking code of 9414810699945041004233 and reference number of Zeppelin32 W0Ll st com 1H Zeppelin 32 st com 2H sec 32 s2 T23S R28 E was successfully delivered to Kathy J. Smith.

CURRENT-ARGUS

AFFIDAVIT OF PUBLICATION

Ad No. 0001292234

JAMES BRUCE ATTORNEY AT LAW PO BOX 1056

SANTA FE NM 87504

I, a legal clerk of the Carlsbad Current-Argus, a newspaper published daily at the City of Carlsbad, in said county of Eddy, state of New Mexico and of general paid circulation in said county; that the same is a duly qualified newspaper under the laws of the State wherein legal notices and advertisements may be published; that the printed notice attached hereto was published in the regular and entire edition of said newspaper and not in supplement thereof on the date as follows, to wit:

07/25/19

Legal Clerk

Subscribed and sworn before me this 25th of July 2019.

State of WI, County of Brown

NOTARY PUBLIC

010.95

My Commission Expires

NOTICE

To: Harvey R. Taylor, Marilyn S. Taylor, Wanda J. Taylor, Bill G. Taylor, Jr., Kathy J. Smith, and Carolyn A. Taylor, or your heirs, devisees, successors, or assigns: Mewbourne Oil Company has filed an application with the New Mexico Oil Conservation Division seeking an order pooling all mineral interests in the Wolfcamp formation underlying the S/2 of Section 32, Township 23 South, Range 28 East, NMPM. The unit will be dedicated to (i) the Zeppelin 32 W2LI State Com. Well No. 2H, a horizontal well with a surface location in the NW/4SW/4, and a bottomhole location in the NE/4SE/4, of Section 32, and (ii) the Zeppelin 32 WOLI State Com. Well No. 1H, a horizontal well with a surface location in the NW/4SW/4, and a bottomhole location in the NE/4SE/4, of Section 32. The producing intervals of the wells will be orthodox. Also to be considered will be the cost of drilling and completing the wells and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells. The application is scheduled to be heard at 8:15 a.m. on Thursday, August 8, 2019 at the Division's offices at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505. As an interest owner in the well unit you have the right to enter an appearance and participate in the case. Failure to appear will preclude you from contesting this matter at a later date. The attorney for applicant is James Bruce, P.O. Box 1056, Santa Fe, New Mexico 87504. The unit is located approximately 2 miles south of Loving, New Mexico.

Published July 25, 2019

EXHIBIT 5

NANCY HEYRMAN Notary Public State of Wisconsin Good afternoon,

Attached please find our Pre-Hearing Statement in Case No. 20679.

Thank you, Karen

Karen Westerlin Paralegal Butler Snow LLP

D: (505) 545-6061 | F: (505) 545-6101 2155 Louisiana Boulevard NE, Suite 10400, Albuquerque, NM 87110 Karen, Westerlin@butlersnow.com | vCard

 $\underline{Twitter} \mid \underline{LinkedIn} \mid \underline{Facebook} \mid \underline{YouTube}$

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF MEWBOURNE OIL COMPANY FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

Case No. 20679

PRE-HEARING STATEMENT

Bill G. Taylor, Jr., Harvey R. Taylor, Marilyn S. Taylor, Carolyn A. (Taylor) Schrock, Wanda Taylor, and Kathy J. Smith ("Taylor Siblings"), by and through their attorneys Butler Snow LLP, hereby submit the following for consideration at the August 22, 2019, hearing of this matter:

APPEARANCES

APPLICANT:

Mewbourne Oil Company

APPLICANT'S ATTORNEY:

James Bruce

OPPONENTS (the "Taylors"):

Bill G. Taylor, Jr., Harvey R. Taylor, Marilyn S.

Taylor, Carolyn A. Schrock, Wanda Taylor,

Kathy J. Smith

OPPONENTS' ATTORNEY:

Derek V. Larson

STATEMENT OF THE CASE

This matter involves the Wolfcamp wells in a well unit comprised of the S/2 of Section 32, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico (the "Property").

Mewbourne Oil Company ("Mewbourne") has filed an application for compulsory pooling. However, Mewbourne's application is based, at least in part, on questionable title to Malaga Tract 519, consisting of approximately 5 acres, more or less, within the southern half of Section 32, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Further Mewbourne's communications with the Taylors regarding their interest and Mewbourne's

attempts secure the Taylors' participation in the wells at issue were inconsistent and predatory. In any event two of the Taylors are in the process of leasing their interests to a third party and the three remaining Taylors intend to participate directly in the wells. Wherefore, Mewbourne's application should be denied as moot and unnecessary.

WITNESSES

Bill G. Taylor, Jr., Harvey R. Taylor, and Marilyn Taylor.

Kevin L. Pearson, Independent Professional Landman, Sarah Lee Provisions, Inc., 203 S. Turner, Hobbs, New Mexico, 88240, (505) 933-0688.

EXHIBITS

See list of exhibits attached hereto.

TIME NEEDED TO PRESENT TAYLOR SIBLINGS' CASE:

45 minutes

PROCEDURAL MATTERS THAT NEED TO BE RESOLVED PRIOR TO HEARING:

Title to Malaga Tract 519.

Respectfully submitted this 14th day of August, 2019.

Derek V. Larson

BUTLER SNOW LLP

2155 Louisiana Blvd. NE, Suite 10400

Albuquerque, NM 87110

(505) 545-6080

(505) 545-6101 (facsimile)

Derek.Larson@ButlerSnow.com

Attorneys for Bill G. Taylor, Jr., Harvey R. Taylor,

Marilyn S. Taylor, Carolyn A. (Taylor) Schrock,

Wanda Taylor, Kathy J. Smith

CERTIFICATE OF SERVICE

The undersigned certifies that on the 14th day of August, 2019, a true and correct copy of the foregoing *Pre-Hearing Statement* was emailed to:

James Bruce Post Office Box 1056 Santa Fe, NM 87504 jamesbruc@aol.com

Derek V. Larson

48638163.v1

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF MEWBOURNE OIL COMPANY FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

Case No. 20679

EXHIBITS TO AUGUST 22, 2019 HEARING

Α.	3/28/1974	New Mexico Property Appraisal Department Deed to W. H. Taylor
B.	1/18/1975	W. H. Taylor Warranty Deed to Bill G. Taylor, Sr.
C.	10/26/1976	Bill G. Taylor, Sr., Quitclaim Deed of Surface to LaVerne Skinner Smith
D.	4/27/1981	Bill G. Taylor, Sr., Oil & Gas Lease to W. H. and June Taylor
E.	10/31/2002	Order Admitting Will of Bill G. Taylor, Sr., to Probate
F.	1/15/2018	Daisy June Taylor Oil & Gas Lease to Mewbourne
G.	11/20/2018	Excerpt of Mewbourne Oil Company's Division Order Title Opinion
H.	5/7/2019	Kevin L. Pearson's Report/Limited Chain of Title
I.	8//2019	Stipulation and Quitclaim Deed from June Taylor to Taylor Siblings
J.	2/6/2018	Mewbourne Pooling Amended Application for Southern half of Section 32 (Case No. 15991)
K.	3/8/2018	Hearing Exhibit 3 to above Pooling Application (Case No. 15991): Tract Ownership List of Property Ownership Interests
L.	3/8/2018	Exhibit 8 to above Pooling Application (Case No. 15991): Affidavit of Notice
M.	6/28/2018	Pooling Order No. R-14757 – Case No. 15991
N.	8/14/2019	Quitclaim Deed from Wanda Taylor to Taylor Siblings
Ο.	8//2019	Kathy J. Smith Oil and Gas Lease to Ozark Realty
P.	8//2019	Carolyn A. Schrock Oil and Gas Lease to Ozark Realty
Q.	7/25/2019	Summary of Correspondence between Taylors and Mewbourne
R.	2/19/2019	Paul Haden Correspondence to Taylors
S.	2/28/2019	Harvey Taylor E-Mail to Paul Haden

T.	3/1/2019	Paul Haden E-Mail to Harvey Taylor
U.	3/12/2019	Cy Shook E-Mail to Harvey Taylor
V.	3/12/2019	Harvey Taylor E-Mail to Cy Shook
W.	8//2019	Mewbourne Authorization for Expenditures for Zeppelin 32 W0LI State Com #1H and Zeppelin 32 W2LI State Com #2H approved by Bill G. Taylor, Jr.
X.	8//2019	Mewbourne Authorization for Expenditures for Zeppelin 32 W0LI State Com #1H and Zeppelin 32 W2LI State Com #2H approved by Harvey R. Taylor.
Y.	8//2019	Mewbourne Authorization for Expenditures for Zeppelin 32 W0LI State Com #1H and Zeppelin 32 W2LI State Com #2H approved by Marilyn S. Taylor.

Any Exhibit offered by Applicant.

Karen Westerlin

Channel-3 Page 6

8/15/2019 5:31:54 PM

Z.

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

APPLICATIONS OF MEWBOURNE OIL COMPANY FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

Case No. 20679

SELF-AFFIRMED STATEMENT OF NOTICE

COUNTY OF SANTA FE)
STATE OF NEW MEXICO) ss.)

James Bruce deposes and states:

- 1. I am over the age of 18, and have personal knowledge of the matters stated herein.
- 2. I am an attorney for Mewbourne Oil Company.
- 3. Mewbourne Oil Company has conducted a good faith, diligent effort to find the names and correct addresses of the interest owners entitled to receive notice of the application filed herein.
- 4. Notice of the application was provided to the interest owners, at their last known addresses, by certified mail. Copies of the notice letter and certified return receipts are attached hereto as Attachment A.
 - 5. Applicant has complied with the notice provisions of Division Rules.
- 6. I understand that this Self-Affirmed Statement will be used as written testimony in this case. I affirm that my testimony in paragraphs 1 through 5 above is true and correct and is made under penalty of perjury under the laws of the State of New Mexico. My testimony is made as of the date handwritten next to my signature below.

Date: Arg. 21, 2019

James Bruce

EXHIBIT

			,
			•
			•

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)

jamesbruc@aol.com

July 17, 2019

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

To: Persons on Exhibit A

Ladies and gentlemen:

Enclosed is a copy of an application for compulsory pooling (Case No. 20679), filed with the New Mexico Oil Conservation Division by Mewbourne Oil Company, regarding Wolfcamp wells in a well unit comprised of the S/2 of Section 32, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico.

This matter is scheduled for hearing at 8:15 a.m. on Thursday, August 8, 2019, in Porter Hall at the Division's offices at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505. You are not required to attend this hearing, but as an owner of an interest who may be affected by the application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from contesting this matter at a later date.

A party appearing in a Division case is required by Division Regulations to file a Pre-Hearing Statement no later than Wednesday, August 1, 2019. This statement must be filed with the Division's Santa Fe office at the above address, and should include: The names of the party and his or her attorney; a concise statement of the case; the names of the witnesses the party will call to testify at the hearing; the approximate time the party will need to present its case; and identification of any procedural matters that need to be resolved prior to the hearing

Verystruly yours,

squies bruce

Attorney for Mewbourne Oil Company

ATTACHMENT

EXHIBIT A

Harvey R. Taylor 124 South 5th Street Carlsbad, New Mexico 88220

Marilyn S. Taylor 2310 Avenue B Carlsbad, New Mexico 88220

Wanda J. Taylor 1106 North Country Club Circle Carlsbad, New Mexico 88220

Bill G. Taylor, Jr. 199 11th Street NW Rio Rancho, New Mexico 87144

Kathy J. Smith 233 New Mexico Drive Portales, New Mexico 88130

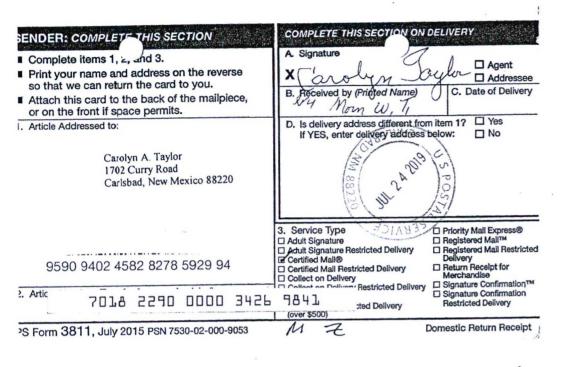
Carolyn A. Taylor 1702 Curry Road Carlsbad, New Mexico 88220

3. Service Type Adjut Signature Adjut Signature Restricted Delivery 9590 9402 4582 8278 5930 21 3. Service Type Registered Mail Express® Registered Mail Majure Registered Mail Restricted Delivery Registered Mail Restricted Delivery	SENDER: COMPLET THIS SECTION Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. Article Addressed to: Wanda J. Taylor 1106 North Country Club Circle Carlsbad, New Mexico 88220	A. Signature X. August Addressee B. Received by (Printed Name) C. Date of Delivery D. Is delivery address different from item 1? Yes If YES, enter delivery address below: No	U.S. Postal Service CERTIFIED MAIL® RECEIPT Domestic Mail Only For delivery information, visit our website at www.usps.com®. Certified Mail Fee \$ Extra Services & Fees (check box, add fee as appropriate) Return Receipt (hardcopy) \$ Return Receipt (electronic) \$ Certified Mail Restricted Delivery \$ Adult Signature Restricted Delivery \$ Postage \$ Total Postage and Fees
2. 7 1 8 229 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	2., 7018 2290 0000 3426 9	□ Adult Signature □ Adult Signature Restricted Delivery □ Certified Mail® □ Certified Mail Restricted Delivery □ Collect on Delivery □ Very Restricted Delivery □ Signature Confirmation™ □ Signature Confirmation □ Signature Confirmation □ Signature Confirmation □ Signature Confirmation	Bill G. Taylor, Jr. Sent To 199 11th Street NW Street and Apt. No., or P. Rio Rancho, New Mexico 87144 City, State, ZIP+4*

9872		
_	OFFICIAL	II G E
0 0000 342	Certified Mail Fee \$ Extra Services & Fees (check box, add fee as appropriate) Return Receipt (hardcopy) \$ Return Receipt (electronic) \$ Certified Mail Restricted Delivery \$ Adult Signature Required \$ Adult Signature Restricted Delivery \$ Postage	Postmark Here
2290	\$ Total Postage and Fees	
7018	Sent To Wanda J. Taylor 1106 North Country Clu Street and Apt. No., or PO E Carlsbad, New Mexico	ub Circle 88220
	City, State, ZiP+4* PS Form 3800, April 2015 PSN 7530-02-000-9047 S	ee Reverse for Instructions

*

-		THE RESERVE OF THE PARTY OF THE		
	Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. Article Addressed to: Bill G. Taylor, Jr. 199 11th Street NW Rio Rancho, New Mexico 87144	A Signatur X B - B. Receive	d by (Printed Name) Ty address different froenter delivery address	Agent Addressee Date of Delivery We lock The lock Addressee
	9590 9402 4582 8278 5930 14	☐ Certified Ma☐ Certified Ma☐ Collect on D	ture ture Restricted Delivery Lil® Lil Restricted Delivery	☐ Priority Mail Express®☐ Registered Mail I™☐ Registered Mail Restricted Delivery☐ Return Receipt for Merchandise☐ Signature Confirmation™
	2. A 7018 2290 0000 3426	9865	stricted Delivery	☐ Signature Confirmation Restricted Delivery
	PS Form 3811. July 2015 PSN 7530-02-000-9053	M	7	Domestic Return Receipt





U.S. Postal Service™ CERTIFIED MAIL® RE Domestic Mail Only For deliver	CEIPT
Certified Mail Fee S Extra Services & Fees (check box and the	e at www.usps.com®.
Certified Mail Restricted Delivery \$ Adult Signature Required \$ Adult Signature Restricted Delivery \$ Postage	Postmark Here
Total Postage and Fees \$ Sent To Carolyn A. Taylor 1702 Curry Road City, State, ZiP+4*	
PS Form 3800, April 2015 PSN 7530-02-000 ST	Reverse for Instructions

SENDER: COMPLET THIS SECTION Complete items 1, ≥, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. Article Addressed to:	A. Signature A. Signature A. Signature A. Signature Addressee B. Received by (Payted Name) C. Date of Delivery
Marilyn S. Taylor 2310 Avenue B Carlsbad, New Mexico 88220	D. Is delivery address different from item 1? Yes If YES, enter delivery address below: No
9590 9402 4582 8278 5930 38 2. Article 7018 2290 0000 3428	3. Service Type ☐ Adult Signature ☐ Adult Signature Restricted Delivery ☐ Certified Mail Restricted Delivery ☐ Collect on Delivery ☐ Collect on Delivery Restricted Delivery ☐ Delivery ☐ Collect on Delivery Restricted Delivery ☐ The Indian Type ☐ Delivery ☐ Signature Confirmation ☐ Restricted Delivery ☐ Signature Confirmation ☐ Restricted Delivery
PS Form 3811, July 2015 PSN 7530-02-000-9053	M 7 Domestic Return Rec

SENDER: COMPLETE THIS SECTION Complete Items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. Article Addressed to: Harvey R. Taylor 124 South 5th Street Carlsbad, New Mexico 88220	A. Signature X. M. J. J. Agent Addressee B. Received by (Printed Name) D. Is delivery address different from item 1? Yes If YES, enter-delivery address below: No	U.S. F CER Domest For deliv Certified Mai \$ Extra Service Return Re Certified Mai \$ Adult Sign Adult Sign Adult Sign Postage
	3. Service Type ☐ Adult Signature ☐ Adult Signature Restricted Delivery ☐ Certified Mail® ☐ Certified Mail Restricted Delivery ☐ Collect on Delivery ☐ Collect on Delivery ☐ Signature Confirmation™ ☐ Signature Confirmation™ ☐ Signature Confirmation Restricted Delivery ☐ Cover \$500	Total Posta \$ Sent To Sireet and P City, State,
PS Form 3811, July 2015 PSN 7530-02-000-9053	Domestic Return Receipt	

9896	U.S. Postal Service™ CERTIFIED MAIL® RECE Domestic Mail Only For delivery information, visit our website at		
2018 2290 0000 3426	Certified Mail Fee \$ Extra Services & Fees (check box, add fee as appropriate) Return Receipt (hardcopy)	Postmark Here	
	City, State, ZIP+4* PS Form April 2015 PSN 7530-02-000-9047	See Reverse for Instructions	

CE Doi Fer	S. Postal Service™ ERTIFIED MAIL® REC mestic Mail Only delivery information, visit our website	at www.usps.com®.
\$ Extra S Ret Ret Add Add Add Add Add Add Sent 7 Total F Street City, S	Postage and Fees	Postmark Here