

**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 NOS. 23397–23398

MEWBOURNE’S CONSOLIDATED PRE-HEARING STATEMENT

Mewbourne Oil Company (“Mewbourne” or “Applicant”), the applicant in the above-referenced matters, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Mewbourne Oil Company
 (“Mewbourne”)

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paula M. Vance
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
pmvance@hollandhart.com

APPLICANT’S STATEMENT OF THE CASE

1. In these cases, Mewbourne seeks an order pooling all uncommitted interests in the Purple Sage Wolfcamp (gas) Pool [Pool Code 98220] underlying the referenced acreage all in Township 22 South, Range 27 East, NMPM, Eddy County, New Mexico, as follows:

- Under **Case No. 23397**, Mewbourne seeks to pool a standard 640-acre, more or less, horizontal well spacing unit comprised of the N/2 of Sections 22 and 21. Mewbourne

proposes to dedicate the above-referenced spacing unit to the proposed initial **Papa Grande 22/21 W0AD Fee 1H** well, to be horizontally drilled with a first take point in the NE/4 NE/4 (Unit A) of Section 22 and a last take point in the NW/4 NW/4 (Unit D) of Section 21; and the **Papa Grande 22/21 W0HE Fee 1H** well, to be horizontally drilled with a first take point in the SE/4 NE/4 (Unit H) of Section 22 and a last take point in the SW/4 NW/4 (Unit E) of Section 21.

- Under **Case No. 23398**, Mewbourne seeks to pool a standard 640-acre, more or less, horizontal well spacing unit comprised of the S/2 of Sections 22 and 21, Township 22 South, Range 27 East, NMPM, Eddy County, New Mexico. Mewbourne proposes to dedicate the above-referenced spacing unit to the proposed initial **Papa Grande 22/21 W0IL Fee 1H** well, to be horizontally drilled with a first take point in the NE/4 SE/4 (Unit I) of Section 22 and a last take point in the NW/4 SW/4 (Unit L) of Section 21; and the **Papa Grande 22/21 W0PM Fee 1H** well, to be horizontally drilled with a first take point in the SE/4 SE/4 (Unit P) of Section 22 and a last take point in the SW/4 SW/4 (Unit M) of Section 21.

The completed interval for each of the wells will comply with the Special Pool Rules for the Purple Sage Wolfcamp (gas) Pool. Mewbourne has sought and been unable to obtain voluntary agreement for the development of these lands from all working interest owners in the subject acreage.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Tyler Jolly, Landman	Self-Affirmed Statement	Approx. 7
Tyler Hill, Geologist	Self-Affirmed Statement	Approx. 3

PROCEDURAL MATTERS

Mewbourne requests that these cases be consolidated for hearing and intends to present these cases by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paula M. Vance
Post Office Box 2208
Santa Fe, NM 87504
505-998-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com
pmvance@hollandhart.com

ATTORNEYS FOR MEWBOURNE OIL COMPANY

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 202515

QUESTIONS

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 202515
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	Not answered.
Testimony time (in minutes)	Not answered.