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

# APPLICATION OF MEWBOURNE OIL COMPANY FOR COMPULSORY POOLING AND APPROVAL OF NON-STANDARD SPACING UNIT, EDDY COUNTY, NEW MEXICO.

CASE NO. 24993

### **PRE-HEARING STATEMENT**

Mewbourne Oil Company ("Mewbourne" or "Applicant") submits its Pre-Hearing

Statement pursuant to the rules of the Oil Conservation Division.

#### APPLICANT

Mewbourne Oil Company

Dana S. Hardy Jaclyn M. McLean Dylan M. Villescas Hinkle Shanor LLP P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com dvillescas@hinklelawfirm.com

# **INTERESTED PARTY**

# ATTORNEY

**ATTORNEYS** 

None

#### STATEMENT OF THE CASE

Mewbourne applies for an order pooling all uncommitted interests in the Wolfcamp formation underlying a 1,269.92 acre, more or less, non-standard horizonal spacing unit comprised of Sections 19 and 20, Township 21 South, Range 27 East, Eddy County, New Mexico ("Unit"). Mewbourne seeks to dedicate the Unit to the following wells ("Wells"):

- a. The Canal 20/19 Fed Com #712H well, which will be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 20 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 19;
- b. The Canal 20/19 Fed Com #714H well, which will be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 20 to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 19;
- c. The Canal 20/19 Fed Com #716H well, which will be drilled from a surface hole location in the SW/4 SW/4 (Unit M) of Section 21 to a bottom hole location in the NW/4 SW/4 (Unit L) of Section 19; and
- d. The Canal 20/19 Fed Com #718H well, which will be drilled from a surface hole location in the SW/4 SW/4 (Unit M) of Section 21 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 19.

With this Application, Mewbourne seeks approval of a non-standard horizontal spacing unit to allow it to consolidate surface facilities, which will reduce emissions and best prevent surface, environmental, and economic waste.

The completed 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 costs, the designation of Applicant as operator of the Unit and Wells, and a 200% charge for the risk involved in drilling and completing the Wells. The Wells are located approximately 3 miles north of Carlsbad, New Mexico.

# **PROPOSED EVIDENCE**

Witness	Occupation	<b>Estimated Time</b>	Exhibits
Brad Dunn	Landman	Affidavit	Approx. 6
Charles Crosby	Geologist	Affidavit	Approx. 3

#### PROCEDURAL MATTERS

Applicant intends to consolidate these cases for hearing and will present the cases by

affidavit if there is no opposition to its applications.

Respectfully submitted,

#### HINKLE SHANOR LLP

/s/ Dana S. Hardy Dana S. Hardy Jaclyn M. McLean Dylan M. Villescas P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com dvillescas@hinklelawfirm.com *Counsel for Mewbourne Oil Company*  Sante Fe Main Office Phone: (505) 476-3441

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

QUESTIONS

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Action 415294

QUESTIONS		
	OGRID:	
MEWBOURNE OIL CO	14744	
P.O. Box 5270	Action Number:	
Hobbs, NM 88241	415294	
	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.	