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

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

CASE NOS. 25055-25057, 25059

APPLICANT'S CONSOLIDATED PRE-HEARING STATEMENT

Mewbourne Oil Company ("Mewbourne" or "Applicant") submits this consolidated Pre-

Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

ATTORNEY

Mewbourne Oil Company ("Mewbourne") Michael H. Feldewert Adam G. Rankin Paula M. Vance Holland & Hart LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile

OTHER PARTIES

Avant Operating, LLC ("Avant") – Case Nos. 25055-25057 & 25059	Deana M. Bennett Earl E. DeBrine, Jr. Yarithza Peña Post Office Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, New Mexico 87103-2168 Telephone: 505.848.1800
ConocoPhillips ("Conoco") – Case No. 25059	Elizabeth A. Ryan Keri L. Hatley ConocoPhillips 1048 Paseo de Peralta Santa Fe, New Mexico 87501 (505) 780-8000

APPLICANT'S STATEMENT OF THE CASE

Under these consolidated cases, Mewbourne seeks orders pooling the Bone Spring formation (Corbin, Bone Spring South [13160]) for the referenced acreage, all in Township 18 South, Range 33 East, NMPM, Lea County, New Mexico, as follows:

- Under Case No. 25055, Mewbourne seeks to pool the uncommitted interests underlying a standard 339.24-acre, more or less, horizontal well spacing unit comprised of Lots 1-4 (W2W2 equivalent) of irregular Sections 30 and 19, and initially dedicate the unit to the proposed Mysterio 30/19 Fed 521H well, to be horizontally drilled from a surface location in the SE4SW4 (Unit N) of irregular Section 18, with a first take point in Lot 1 (NW4NW4 equivalent) (Unit D) of irregular Section 19 and a last take point in Lot 4 (SW4SW4 equivalent) (Unit M) of irregular Section 30;
- Under Case No. 25056, Mewbourne seeks to pool the uncommitted interests underlying a standard 320-acre, more or less, horizontal well spacing unit comprised of the E2W2 of irregular Sections 30 and 19, and initially dedicate the unit to the proposed Mysterio 30/19 Fed 523H well, to be horizontally drilled from a surface location in the SE4SW4 (Unit N) of irregular Section 18, with a first take point in the NE4NW4 (Unit C) of irregular Section 19 and a last take point in the SE4SW4 (Unit N) of irregular Section 30;
- Under Case No. 25057, Mewbourne seeks to pool the uncommitted interests underlying a standard 320-acre, more or less, horizontal well spacing unit comprised of the W2E2 of irregular Sections 30 and 19, and initially dedicate the unit to the proposed Mysterio 30/19 Fed 525H well, to be horizontally drilled from a surface location in the SW4SE4 (Unit O) of irregular Section 18, with a first take point in the

NW4NE4 (Unit B) of irregular Section 19 and a last take point in the SW4SE4 (Unit O) of irregular Section 30; and

Under Case No. 25059, Mewbourne seeks to pool the uncommitted interests underlying a standard 320-acre, more or less, horizontal well spacing unit comprised of the E2E2 of irregular Sections 30 and 19, and dedicate the unit to the proposed Mysterio 30/19 Fed Com 527H well, to be horizontally drilled from a surface location in the SW4SE4 (Unit O) of irregular Section 18, with a first take point in the NE4NE4 (Unit A) of irregular Section 19 and a last take point in the SE4SE4 (Unit P) of irregular Section 30.

Due to concerns regarding the Dune Sagebrush Lizard, Mewbourne was advised by the Bureau of Land Management that it would be required to change the surface hole and bottom hole locations for the proposed wells. This change is not a material impact to the proposed horizontal spacing units.

The completed interval for each well will comply with statewide setbacks for oil wells. Mewbourne has sought but been unable to obtain voluntary agreement for the development of these lands from all interest owners in the subject spacing units.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brock Dixon, Landman	Self-Affirmed Statement	Approx. 5
Charles Crosby, Geologist	Self-Affirmed Statement	Approx. 3

PROCEDURAL MATTERS

Mewbourne requests that these matters 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: Pathur

Michael H. Feldewert Adam G. Rankin Paula M. Vance Post Office Box 2208 Santa Fe, NM 87504 505-988-4421 505-983-6043 Facsimile mfeldewert@hollandhart.com agrankin@hollandhart.com

ATTORNEYS FOR MEWBOURNE OIL COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2025, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Deana M. Bennett Earl E. DeBrine, Jr. Yarithza Peña Post Office Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, New Mexico 87103-2168 Telephone: 505.848.1800 deana.bennett@modrall.com earl.debrine@modrall.com Yarithza.Pena@modrall.com *Attorneys for Avant Operating, LLC*

Elizabeth Ryan Keri L. Hatley ConocoPhillips 1048 Paseo de Peralta Santa Fe, New Mexico 87501 (505) 780-8000 beth.ryan@conocophillips.com keri.hatley@conocophillips.com *Attorneys for ConocoPhillips*

Father

Paula M. Vance

Sante Fe Main Office Phone: (505) 476-3441

General Information Phone: (505) 629-6116

Online Phone Directory https://www.emnrd.nm.gov/ocd/contact-us

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

QUESTIONS

Page 6 of 6

Action 429071

QUESTIONS		
Operator:	OGRID:	
MEWBOURNE OIL CO	14744	
P.O. Box 5270	Action Number:	
Hobbs, NM 88241	429071	
	Action Type: [HEAR] Prehearing Statement (PREHEARING)	

QUESTIONS

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