

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

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

CASE NO. 25365

MEWBOURNE'S PRE-HEARING STATEMENT

Mewbourne Oil Company ("Mewbourne" or "Applicant"), the applicant in the above-referenced case, submits this 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
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Holland & Hart LLP
Post Office Box 2208
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APPLICANT'S STATEMENT OF CASE

Under **Case No. 25365**, Mewbourne seeks an order pooling all uncommitted interests in a standard 640-acre, more or less, horizontal well spacing unit in the Bone Spring formation (Vacuum; Bone Spring, South [61900]) underlying the E/2 of Sections 15 and 22, Township 18 South, Range 35 East, NMPM, Lea County, New Mexico. Mewbourne seeks to initially dedicate the unit to the proposed **Seafood Tower 22/15 State Com #527H** well to be drilled from a surface hole location in the SW/4 SW/4 (Unit M) of Section 23 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 15.

The completed interval of the well is expected to remain within 330 feet of the adjoining quarter-quarter section (or equivalent) tracts to allow inclusion of these proximity tracts within the proposed spacing unit under 19.15.16.15.B(1)(b) NMAC. Mewbourne has sought but been unable to obtain voluntary agreement for the development of these lands from all interest owners in the subject acreage.

APPLICANT'S PROPOSED EVIDENCE

| WITNESS Name and Expertise | ESTIMATED TIME | EXHIBITS |
|---------------------------------------|-------------------------|-----------------|
| Peyton Warren, Landman | Self-Affirmed Statement | Approx. 4 |
| Charles Crosby, Geologist | Self-Affirmed Statement | Approx. 3 |

PROCEDURAL MATTERS

Mewbourne intends to present this case by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP



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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

Action 468665

QUESTIONS

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|---|--|
| Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241 | OGRID: 14744 |
| | Action Number: 468665 |
| | Action Type: [HEAR] Prehearing Statement (PREHEARING) |

QUESTIONS

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