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

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

**CASE NO. 25383** 

## PRE-HEARING STATEMENT

Mewbourne Oil Company ("Applicant") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPLICANT ATTORNEYS** 

Mewbourne Oil Company Dana S. Hardy Jaclyn M. McLean

Daniel B. Goldberg Hardy McLean LLC

125 Lincoln Ave, Ste. 223

Santa Fe, NM 87501 Phone: (505) 230-4410 dhardy@hardymclean.com jmclean@hardymclean.com dgoldberg@hardymclean.com

INTERESTED PARTY **ATTORNEYS** 

None.

### STATEMENT OF THE CASE

Applicant seeks an order pooling all uncommitted interests in the Bone Spring formation underlying a 160-acre, more or less, standard horizonal spacing unit comprised of the E/2 E/2 of Section 27, Township 23 South, Range 28 East, Eddy County, New Mexico ("Unit"). The Unit will be dedicated to the Speedwagon 27 Fee #528H well ("Well"), which will 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 SE/4 SE/4 (Unit P) of Section 27. The completed interval of the Well will be orthodox. Also to be considered will be the cost of drilling and completing the Well, the allocation of the costs, the

designation of Applicant as operator of the Well and the Unit, and a 200% charge for the risk involved in drilling and completing the Well.

# **PROPOSED EVIDENCE**

Witness	Occupation	<b>Estimated Time</b>	<b>Exhibits</b>	_
Mitch Robb	Landman	Affidavit	Approx. 5	
Tyler Hill	Geologist	Affidavit	Approx. 3	

# PROCEDURAL MATTERS

Applicant intends to present the case by affidavit if there is no opposition to its application.

Respectfully submitted,

HARDY MCLEAN LLC

/s/ Dana S. Hardy

Dana S. Hardy Jaclyn M. McLean

Daniel B. Goldberg

125 Lincoln Ave, Ste. 223

Santa Fe, NM 87501

Phone: (505) 230-4410

dhardy@hardymclean.com

jmclean@hardymclean.com dgoldberg@hardymclean.com

Counsel for Mewbourne Oil Company

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

General Information Phone: (505) 629-6116

Online Phone Directory <a href="https://www.emnrd.nm.gov/ocd/contact-us">https://www.emnrd.nm.gov/ocd/contact-us</a>

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

QUESTIONS

Action 468497

### **QUESTIONS**

Operator:	OGRID:
MEWBOURNE OIL CO	14744
P.O. Box 5270	Action Number:
Hobbs, NM 88241	468497
	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.		