# 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. 25630 & 25631

# MEWBOURNE OIL COMPANY'S CONSOLIDATED PRE-HEARING STATEMENT

Mewbourne Oil Company, ("Mewbourne" or "Applicant"), the applicant in this case, submits this consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division

### **APPEARANCES**

# **APPLICANT**

## **ATTORNEY**

Mewbourne Oil Company

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

## **APPLICANT'S STATEMENT OF THE CASE**

Under these consolidated cases, Mewbourne seeks orders pooling for the referenced acreage, all in Township 21 South, Range 25 East, and Township 21 South, Range 26 East, NMPM, Eddy County, New Mexico in the Wolfcamp (oil) formation (WC-025 G-09 S263619C; Wolfcamp [98234]) as follows:

• Under Case No. 25630, Mewbourne seeks to pool the uncommitted interest owners in a standard 317.68-acre, more or less, horizontal well spacing unit comprised of Lots 1-4 (N/2 N/2 equivalent) of irregular Section 12, T21S-R25E, and Lots 5-8 (N/2 N/2

equivalent) of irregular Section 7, T21S-R26E, to be initially dedicated to the proposed **Stage Fright 12/7 Federal Com 711H** well, to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of irregular Section 11, to a bottom hole location in Lot 5 (NE/4 NE/4 equivalent) of irregular Section 7; and

• Under Case No. 25631, Mewbourne seeks to pool the uncommitted interest owners in a standard 317.82-acre, more or less, horizontal well spacing unit comprised of Lots 5-8 (S/2 N/2 equivalent) of irregular Section 12, T21S-R25E, and Lots 9-12 (S/2 N/2 equivalent) of irregular Section 7, T21S-R26E, to be initially dedicated to the proposed Stage Fright 12/7 Federal Com 713H well, to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of irregular Section 11, to a bottom hole location in Lot 12 (SE/4 NE/4 equivalent) of irregular Section 7.

The completed interval for the wells 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
Ariana Rodrigues, Landman	Self-Affirmed Statement	Approx. 4
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: Pakhil Adam G. Rankin Paula M. Vance Post Office Box 2208 Santa Fe, NM 87504 505-998-4421 505-983-6043 Facsimile agrankin@hollandhart.com pmvance@hollandhart.com

ATTORNEYS FOR MEWBOURNE OIL COMPANY

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

Action 511861

#### **QUESTIONS**

Operator:	OGRID:
MEWBOURNE OIL CO	14744
P.O. Box 5270	Action Number:
Hobbs, NM 88241	511861
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

#### QUESTIONS

Testimony			
Please assist us by provide the following information about your testimony.			
Number of witnesses	2		
Testimony time (in minutes)	5		