

**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. 26350 & 26353

**APPLICATIONS OF MEWBOURNE OIL
COMPANY FOR APPROVAL OF AN
OVERLAPPING HORIZONTAL WELL
SPACING UNIT AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NOS. 26351-26352

MEWBOURNE'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

Mewbourne Oil Company

ATTORNEY

Adam G. Rankin
Paula M. Vance
A. Raylee Starnes
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile

OTHER PARTIES

COG Operating LLC
Concho Oil & Gas

ATTORNEY

Dana S. Hardy
Jaclyn M. McLean
Yarithza Peña
125 Lincoln Ave., Suite 223
Santa Fe, NM 87501
(505) 230-4410

ConocoPhillips

Elizabeth Ryan
Keri L. Hatley
ConocoPhillips
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000

APPLICANT'S STATEMENT OF THE CASES

Under these consolidated cases, Mewbourne seeks orders pooling in the Bone Spring formation (Mescalero Escarpe; Bone Spring [45793]) for the referenced acreage, all in Township 18 South, Range 33 East, NMPM, Lea County, New Mexico, as follows:

- Under **Case No. 26350**, Mewbourne seeks to pool the uncommitted interest owners in a standard 320-acre, more or less, well spacing unit underlying the W/2 W/2 of Sections 13 and 24, to be initially dedicated to the proposed **Pile Driver 24/13 Fed Com 521H** well, to be drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 24, and a bottomhole location in the NW/4 NW/4 (Unit D) of Section 13.
- Under **Case No. 26351**, Mewbourne seeks to pool the uncommitted interest owners in an overlapping, 320-acre, more or less, standard horizontal well spacing unit in the Bone Spring formation underlying the E/2 W/2 of Sections 13 and 24, to be initially dedicated to the proposed **Pile Driver 24/13 Fed Com 524H** well, to be drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 24, and a bottomhole location in the NE/4 NW/4 (Unit C) of Section 13. The proposed horizontal well spacing unit will overlap the following existing Bone Spring spacing unit:
 - 40-acre vertical well spacing unit comprised of the NE/4 NW/4 (Unit C) of Section 13, T18S-R33E, dedicated to the Mescalero Ridge B Federal #001 well (API No. 30-025-29315), operated by Seely Oil Co (OGRID No. 20497).

- Under **Case No. 26352**, Mewbourne seeks to pool the uncommitted interest owners in an overlapping, 320-acre, more or less, standard horizontal well spacing unit in the Bone Spring formation underlying the W/2 E/2 of Sections 13 and 24, to be initially dedicated to the proposed **Pile Driver 24/13 Fed Com 526H** well, to be drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 24, and a bottomhole location in the NW/4 NE/4 (Unit B) of Section 13. The proposed horizontal well spacing unit will overlap the following existing Bone Spring spacing unit:
 - 40-acre vertical well spacing unit comprised of the NW/4 NE/4 (Unit B) of Section 13, T18S-R33E, dedicated to the Mescalero Ridge Federal #001 well (API No. 30-025-29279), operated by Seely Oil Co (OGRID No. 20497).
- Under **Case No. 26353**, Mewbourne seeks to pool the uncommitted interest owners in a standard 320-acre, more or less, well spacing unit underlying the E/2 E/2 of Sections 13 and 24, to be initially dedicated to the proposed **Pile Driver 24/13 Fed Com 528H** well, to be drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 24, and a bottomhole location in the NE/4 NE/4 (Unit A) of Section 13.

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
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: 

Adam G. Rankin
Paula M. Vance
A. Raylee Starnes
Post Office Box 2208
Santa Fe, NM 87504
505-998-4421
505-983-6043 Facsimile
agrarkin@hollandhart.com
pmvance@hollandhart.com
arstarnes@hollandhart.com

ATTORNEYS FOR MEWBOURNE OIL COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on August 11, 2026, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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 Company

Dana S. Hardy
Jaclyn M. McLean
Yarithza Peña
HARDY MCLEAN LLC
125 Lincoln Ave., Suite 223
Santa Fe, NM 87505
(505) 230-4410
dhardy@hardymclean.com
jmclean@hardymclean.com
ypena@hardymclean.com

Attorneys for Concho Oil & Gas and COG Operating LLC



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

Action 613445

QUESTIONS

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88240	OGRID: 14744
	Action Number: 613445
	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.