

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

**APPLICATION OF MEWBOURNE OIL COMPANY
TO RE-OPEN CASE NO. 21496, FOR COMPULSORY
POOLING, TO POOL ADDITIONAL PARTIES, EDDY
COUNTY, NEW MEXICO.**

Case No. _____

APPLICATION

Mewbourne Oil Company applies for an order pooling all mineral interests in the Wolfcamp formation underlying a horizontal spacing unit comprised of the N/2 of Section 28 and the N/2 of Section 29, Township 22 South, Range 27 East, N.M.P.M., Eddy County, New Mexico, and in support thereof, states:

1. Applicant is an interest owner in the N/2 of Section 28 and the N/2 of Section 29, and has the right to drill a well or wells thereon.

2. Applicant proposes to drill the following wells to a depth sufficient to test the Wolfcamp formation:

(a) The City Slickers 28/29 W0HE Fee Well No. 1H, with a first take point in the SE/4NE/4 of 28 and a last take point in the SW/4NW/4 of Section 29; and

(b) The City Slickers 28/29 W0AD Fee Well No. 1H, with a first take point in the NE/4NE/4 of 28 and a last take point in the NW/4NW/4 of Section 29.

The N/2 of Section 28 and the N/2 of Section 29 will be dedicated to the wells.

3. This matter was heard in Case No. 21496, in which Order No. R-21537 was issued. Additional parties need to be pooled into the well unit.

4. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the N/2 of Section 28 and the N/2 of Section 29 for the purposes set forth herein.

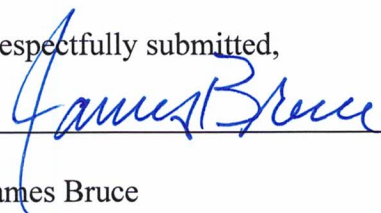
5. Although applicant attempted to obtain voluntary agreements from all mineral interest owners to participate in the drilling of the wells or to otherwise commit their interests to the wells, certain interest owners have failed or refused to join in dedicating their interests. Therefore, applicant seeks an order pooling all mineral interest owners in the Wolfcamp formation underlying the N/2 of Section 28 and the N/2 of Section 29, pursuant to NMSA 1978 §§70-2-17.

6. The pooling of all mineral interest owners in the Wolfcamp formation underlying the N/2 of Section 28 and the N/2 of Section 29 will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

WHEREFORE, applicant requests that, after notice and hearing, the Division enter its order:

- A. Pooling all mineral interest owners in the Wolfcamp formation underlying the N/2 of Section 28 and the N/2 of Section 29;
- B. Designating applicant as operator of the wells;
- C. Considering the cost of drilling, completing, and equipping the wells, and allocating the cost among the wells' working interest owners;
- D. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and
- E. Setting a 200% charge for the risk involved in drilling, completing, and equipping the wells in the event a working interest owner elects not to participate in the wells.

Respectfully submitted,



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