

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

IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:

APPLICATION OF THE OIL CONSERVATION
DIVISION FOR ORDERS AMENDING APDS
AND TO ORDER TEMPORARY CESSATION
OF DRILLING AND COMLETION ACTIVITIES,
EDDY COUNTY, NEW MEXICO.

Case No. 22472

ENTRY OF APPEARANCE AND
PRE-HEARING STATEMENT

James Bruce enters his appearance on behalf of Mewbourne Oil Company (“Mewbourne”) in this matter.

This pre-hearing statement is submitted by Mewbourne as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Oil Conservation Division

APPLICANT’S ATTORNEY

Eric Ames
Jesse Tremaine

OTHER PARTIES

Mewbourne Oil Company

OTHER PARTIES’ ATTORNEYS

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Tap Rock Operating, LLC
Matador Production Company
WPX Energy Permian, LLC

Michael Feldewert
Adam Rankin
Julia Broggi

STATEMENT OF THE CASE

APPLICANT

The Division seeks a temporary cessation of drilling and completion activities for certain wells within 5 miles of the Carlsbad Brine Well Cavity.

OTHER PARTIES

Mewbourne is the operator of certain enumerated wells in the application. Mewbourne does not oppose the application, and does not intend to present a witness unless the Division has questions for Mewbourne. Mewbourne has worked with, and will continue to work with the Division on this matter.

However, four Mewbourne wells have been have been drilled to the point where they can be completed. Mewbourne is concerned about these wells not being allowed to be completed, due to safety concerns, with pipe in the hole. It has expended considerable sums of money, which it is not allowed to recover. In addition, the Division has allowed Devon Energy Production Company, L.P. to drill and complete wells which offset Mewbourne’s wells. This raises correlative rights issues for Mewbourne and its interest owners

Mewbourne requests that once remediation is complete, approval of completion activities be approved in an expedited manner.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OTHER PARTIES

WITNESSES

EST. TIME

EXHIBITS

Corey Mitchell
(landman)

10 minutes

POTENTIAL WITNESS

PROCEDURAL MATTERS

Respectfully submitted,

James Bruce
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Attorney for Mewbourne Oil Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 28th day of January, 2022 by e-mail:

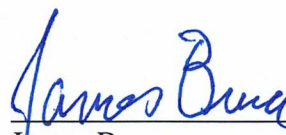
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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 76216

QUESTIONS

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 76216
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>