

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

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

Case No. _____

APPLICATION

Mewbourne Oil Company applies for an order pooling all uncommitted mineral interest owners in the Bone Spring formation underlying a horizontal spacing unit comprised of Lot 2, SW/4NE/4, and W/2SE/4 (the W/2E/2) of Section 5, Township 22 South, Range 34 East, N.M.P.M., and the W/2E/2 of Section 32, Township 21 South, Range 34 East, N.M.P.M., all in Lea County, New Mexico, and in support thereof, states:

1. Applicant is an interest owner in the W/2E/2 of Section 5 and the W/2E/2 of Section 32, and has the right to drill a well or wells thereon.
2. Applicant proposes to drill (a) the Red Stag B2OB Fed. Com. Well No. 1H and (b) the Red Stag B3OB Fed. Com. Well No. 1H to depths sufficient to test the Bone Spring formation, with first take points in the SW/4SE/4 of Section 5 and last take points in the NW/NE/4 of Section 32.
3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the W/2E/2 of Section 5 and the W/2E/2 of Section 32 for the purposes set forth herein.
4. 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 Bone Spring

formation underlying the W/2E/2 of Section 5 and the W/2E/2 of Section 32, pursuant to NMSA 1978 §70-2-17.

5. The pooling of all mineral interest owners in the Bone Spring formation underlying the W/2E/2 of Section 5 and the W/2E/2 of Section 32 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 Bone Spring formation underlying the W/2E/2 of Section 5 and the W/2E/2 of Section 32;
- 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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