

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

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

**CASE NOS. 22365-22368**

**CONSOLIDATED PRE-HEARING STATEMENT**

Mewbourne Oil Company (“Applicant”) submits its Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Mewbourne Oil Company

**ATTORNEYS**

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**INTERESTED PARTIES**

COG Operating LLC and  
Concho Oil & Gas LLC

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**STATEMENT OF THE CASE**

In **Case No. 22365**, Applicant applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 240-acre, more or less, standard horizontal spacing unit comprised of the E/2E/2 of Section 11 and E/2SE/4 of Section 2, Township 18 South, Range 32 East, Lea County, New Mexico (“Unit”). The Unit will be dedicated to the Dragonstone 11/2 B2PI Fed Com #1 well to be horizontally drilled from a surface hole location in the NE/4NE/4 (Unit A) of Section 14 to a bottom hole location in the NE/4SE/4 (Unit I) of Section 2.

In **Case No. 22366**, Applicant applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 240-acre, more or less, standard horizontal spacing unit comprised of the E/2W/2 of Section 11 and E/2SW/4 of Section 2, Township 18 South, Range 32 East, Lea County, New Mexico (“Unit”). The Unit will be dedicated to the Dragonstone 11/2 B2NK Fed Com #1 well to be horizontally drilled from a surface hole location in the SW/4SW/4 (Unit M) of Section 11 to a bottom hole location in the NE/4SW/4 (Unit K) of Section 2.

In **Case No. 22367**, Applicant applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 240-acre, more or less, standard horizontal spacing unit comprised of the W/2W/2 of Section 11 and W/2SW/4 of Section 2, Township 18 South, Range 32 East, Lea County, New Mexico (“Unit”). The Unit will be dedicated to the Dragonstone 11/2 B2ML Fed Com #1 well to be horizontally drilled from a surface hole location in the SW/4SW/4 (Unit M) of Section 11 to a bottom hole location in the NW/4SW/4 (Unit L) of Section 2.

In **Case No. 22368**, Applicant applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 240-acre, more or less, standard horizontal spacing unit comprised of the W/2E/2 of Section 11 and W/2SE/4 of Section 2, Township 18 South, Range 32 East, Lea County, New Mexico (“Unit”). The Unit will be dedicated to the Dragonstone 11/2 B2OJ

Fed Com #1 well to be horizontally drilled from a surface hole location in the NE/4NE/4 (Unit A) of Section 14 to a bottom hole location in the NW/4SE/4 (Unit J) of Section 2.

Also to be considered in these cases will be the cost of drilling and completing the Wells and the allocation of the costs, the designation of Applicant as the operator of the Wells, and a 200% charge for the risk involved in drilling and completing the Wells. The Wells are located approximately 25 miles southwest of Carlsbad, New Mexico.

**PROPOSED EVIDENCE**

| <b>Witness</b> | <b>Occupation</b> | <b>Estimated Time</b> | <b>Exhibits</b> |
|----------------|-------------------|-----------------------|-----------------|
| Brad Dunn      | Landman           | Affidavit             | Approx. 7       |
| Charles Crosby | Geologist         | Affidavit             | Approx. 4       |

**PROCEDURAL MATTERS**

Applicant requests Case Nos. 22365, 22366, 22367 and 22368 be consolidated for hearing.

Applicant will present its case by affidavit if there is no opposition to its application.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

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**Certificate of Service**

I hereby certify that on February 10, 2022, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS

Action 80721

**QUESTIONS**

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|---|--|
| Operator:<br>Spur Energy Partners LLC<br>9655 Katy Freeway<br>Houston, TX 77024 | OGRID:<br>328947   |
|   | Action Number:<br>80721                                  |
|   | Action Type:<br>[HEAR] Prehearing Statement (PREHEARING) |

**QUESTIONS**

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