

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. 22633 - 22636

ENTRY OF APPEARANCE AND PRE-HEARING STATEMENT

James Bruce enters his appearance in the above cases on behalf of BTA Oil Producers, LLC.

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

APPEARANCES

APPLICANT

Mewbourne Oil Company
Suite 1020
500 West Texas
Midland, Texas 79701

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attention: Brad Dunn
(432) 682-3715

OPPONENT

OPPONENT'S ATTORNEY

OTHER PARTIES

BTA Oil Producers, LLC

OTHER PARTIES' ATTORNEYS

James Bruce

COG Operating LLC

Holland & Hart LLP

STATEMENT OF THE CASE

APPLICANT

Mewbourne seeks orders pooling uncommitted mineral interest owners in the horizontal Bone Spring well units described below:

Case No. 22633: the W/2E/2 of Section 27, Township 22 South, Range 34 East, NMPM, Lea County, New Mexico. The unit will be dedicated to the Perro Loco 27 B3OB Fed. Com. Well No. 1H;

Case No. 22634: the E/2E/2 of Section 22 and the E/2E/2 Section 27, Township 22 South, Range 34 East, NMPM, Lea County, New Mexico. The unit will be dedicated to the Perro Loco 27/22 B3PA Fed. Com. Well No. 2H;

In Case Nos. 22633 and 22634, only the 3rd Bone Spring is sought to be pooled in the proposed well units. It is defined as depths from 10,526 feet subsurface to the base of the Bone Spring formation, at a depth of 11,325 feet subsurface, as found in the Compensated Neutron Litho Density log in the Sun Fed. Com. Well No. 1 (API No. 30-025-30603), located in Unit Letter O of Section 27, Township 22 South, Range 34 East, NMPM.

Case No. 22635: the E/2E/2 of Section 27, Township 22 South, Range 34 East, NMPM, Lea County, New Mexico. The unit will be dedicated to the Perro Loco 27 B2PA Fed. Com. Well No. 1H; and

Case No. 22636: the W/2E/2 of Section 22 and the W/2E/2 Section 27, Township 22 South, Range 34 East, NMPM, Lea County, New Mexico. The unit will be dedicated to the Perro Loco 27/22 B2OB Fed. Com. Well No. 2H.

In Case Nos. 22635 and 22636, only the 2nd Bone Spring is sought to be pooled in the proposed well units. It is defined as depths from 10,087 feet subsurface to the base of the 2nd Bone Spring, at a depth of 10,526 feet subsurface, as found in the Compensated Neutron Litho Density log in the Sun Fed. Com. Well No. 1 (API No. 30-025-30603), located in Unit Letter O of Section 27, Township 22 South, Range 34 East, NMPM.

Also to be considered will be the cost of drilling and completing the wells and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the wells, and a cost plus 200% charge for the risk involved in drilling and completing the wells.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Brad Dunn (landman)	20 min.	Approx. 16
Jordan Carrell (geologist)	10 min.	Approx. 6

OPPONENTS

WITNESSES

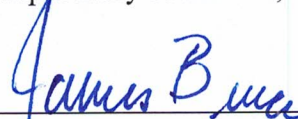
EST. TIME

EXHIBITS

PROCEDURAL MATTERS

1. COG Operating LLC ("COG") had competing applications in Case Nos. 22783 – 22784. However, Mewbourne and COG have signed a JOA, and COG has dismissed its cases. As a result, Mewbourne no longer seeks to pool COG.
2. If these cases are unopposed they will be submitted by affidavit.

Respectfully submitted,



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

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 July, 2022 by e-mail:

Michael Feldewert
mfeldewert@hollandhart.com

Adam Rankin
agrarkin@hollandhart.com

Julia Broggi
jbroggi@hollandhart.com



James Bruce

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720

District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720

District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 Phone:(505) 334-6178 Fax:(505) 334-6170

District IV
 1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 476-3470 Fax:(505) 476-3462

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

QUESTIONS

Action 129625

QUESTIONS

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 129625
	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>