

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

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

**CASE NO. 23115**

**APPLICANT'S PRE-HEARING STATEMENT**

Mewbourne Oil Company (OGRID No. 14744), the applicant in the above-referenced case, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Mewbourne Oil Company

**ATTORNEY**

Michael H. Feldewert, Esq.  
Adam G. Rankin, Esq.  
Julia Broggi, Esq.  
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**OTHER PARTIES**

Coterra Energy, Inc. and  
its subsidiaries incl. Cimarex Energy Co.  
and Magnum Hunter Production, Inc.

**ATTORNEY**

Darin C. Savage  
William E. Zimsky  
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**APPLICANT'S STATEMENT OF CASE**

Mewbourne seeks an order pooling all uncommitted interests in the Bone Spring formation [Benson; Bone Sprig Pool (5200)] underlying a standard 320-acre standard horizontal well spacing

unit comprised of the S/2N/2 of Section 11 and the S/2N/2 of Section 10, Township 19 South, Range 30 East, NMPM, Eddy County, New Mexico. This spacing unit will be initially dedicated to the proposed **Scarecrow 11/10 B3HE Fed Com 1H** well to be horizontally drilled from a surface location in NW/4NW/4 (Unit D) of Section 12 to a bottom hole location in SW/4NW/4 (Unit E) of Section 10, Township 19 South, Range 30 East. Mewbourne has sought but been unable to obtain voluntary agreement for the development of these lands from all mineral interest owners in the subject acreage.

**APPLICANT’S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Tyler Jolly, Landman	Affidavit	Approx. 6
Charley Crosby, Geology	Affidavit	Approx. 3

**PROCEDURAL MATTERS**

Mewbourne intends to present this matter by self-affirmed statements if it remains unopposed at the time of hearing

Respectfully submitted,

HOLLAND & HART LLP



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**ATTORNEYS FOR MEWBOURNE OIL COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that on October 27, 2022, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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**Attorneys for Coterra Energy, Inc. and  
its subsidiaries incl. Cimarex Energy Co.  
and Magnum Hunter Production, Inc.**



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Michael H. Feldewert

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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 154441

**QUESTIONS**

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 154441
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<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>