

**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 NOS. 23170**

**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.  
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Julia Broggi, Esq.  
Paula M. Vance, Esq.  
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**APPLICANT'S STATEMENT OF CASE**

Mewbourne seeks an order pooling all uncommitted interests in the Bone Spring [Winchester Bone Spring Pool (65010)] underlying a standard 619.84-acre horizontal well spacing unit comprised of Lot 6 (NW4SW4 equivalent), Lot 7 (SW4SW4 equivalent), E2SW4, SE4 of irregular Section 6 and S2 of Section 5, Township 20 South, Range 29 East, NMPM, Eddy County, New Mexico. Said horizontal spacing unit is to be initially dedicated to the following proposed wells:

- **Sig 6/5 B2LI Fed 1H** and the **Sig 6/5 B3LI Fed 1H** wells to be horizontally drilled from a surface location in Lot 7 (SW4SW4 equivalent) of irregular Section 6 to a bottom hole location in NE4SE4 (Unit I) of Section 5.
- **Sig 6/5 B2MP Fed 1H** well to be horizontally drilled from a surface location in Lot 7 (SW4SW4 equivalent) of irregular Section 6 to a bottom hole location in the SE4SE4 (Unit P) of Section 5.

The completed interval of the Sig 6/5 B3LI Fed 1H well is expected to remain within 330 feet of the adjoining quarter-quarter section (or equivalent) tracts to allow inclusion of these proximity tracts within the proposed horizontal spacing unit. 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
Charles 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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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
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QUESTIONS

Action 154443

**QUESTIONS**

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 154443
	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>