

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. 22161 - 22164

EPRE-HEARING STATEMENT

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

Attention: Carson Cullen  
(432) 682-3715

APPLICANT'S ATTORNEY

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

OPPONENT

Earthstone Operating, LLC  
COG Operating LLC  
EOG Resources, Inc.  
Apache Corporation

OPPONENT'S ATTORNEY

Holland & Hart LLP  
Ocean Munds-Dry *et al.*  
James B. Parrot  
Modrall Law Firm

STATEMENT OF THE CASE

APPLICANT

Case No. 22161: Mewbourne Oil Company seeks an order pooling all mineral interest owners in the Bone Spring formation underlying a horizontal spacing unit comprised of the W/2W/2 of Section 18 and the W/2W/2 of Section 19, Township 19 South, Range 33 East, NMPM. The unit will be dedicated to (a) the Spanish Bay 18/19 B1DM Fed. Com. Well No. 1H, with a first take point in the NW/4NW/4 of 18 and a last take point in the SW/4SW/4 of Section 19, and (b) the Spanish Bay 18/19 B2DM Fed. Com. Well No. 1H, with a first take point in the NW/4NW/4 of 18 and a last take point in the SW/4SW/4 of Section 19.

Case No. 22162: Mewbourne Oil Company seeks an order pooling all mineral interest owners in the Bone Spring formation underlying a horizontal spacing unit comprised of the E/2W/2 of Section 18 and the E/2W/2 of Section 19, Township 19 South, Range 33 East, NMPM. The unit will be dedicated to (a) the Spanish Bay 18/19 B1CN Fed. Com. Well No. 1H, with a first take point in the NE/4NW/4 of 18 and a last take point in the SE/4SW/4 of Section 19, and (b) the Spanish Bay 18/19 B2CN Fed. Com. Well No. 1H, with a first take point in the NE/4NW/4 of 18 and a last take point in the SE/4SW/4 of Section 19.

Case No. 22163: Mewbourne Oil Company seeks an order pooling all mineral interest owners in the Bone Spring formation underlying a horizontal spacing unit comprised of the W/2E/2 of Section 18 and the W/2E/2 of Section 19, Township 19 South, Range 33 East, NMPM. The unit will be dedicated to (a) the Spanish Bay 18/19 B1BO Fed. Com. Well No. 1H, with a first take point in the NW/4NE/4 of 18 and a last take point in the SW/4SE/4 of Section 19, and (b) the Spanish Bay 18/19 B2BO Fed. Com. Well No. 1H, with a first take point in the NW/4NE/4 of 18 and a last take point in the SW/4SE/4 of Section 19.

Case No. 22164: Mewbourne Oil Company seeks an order pooling all mineral interest owners in the Bone Spring formation underlying a horizontal spacing unit comprised of the E/2E/2 of Section 18 and the E/2E/2 of Section 19, Township 19 South, Range 33 East, NMPM. The unit will be dedicated to (a) the Spanish Bay 18/19 B1AP Fed. Com. Well No. 1H, with a first take point in the NE/4NE/4 of 18 and a last take point in the SE/4SE/4 of Section 19, and (b) the Spanish Bay 18/19 B2AP Fed. Com. Well No. 1H, with a first take point in the NE/4NE/4 of 18 and a last take point in the SE/4SE/4 of Section 19.

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>
Carson Cullen (landman)	20 min.	Approx. 16
Jordan Carrell (geologist)	10 min.	Approx. 6

OPPONENTS

WITNESSES

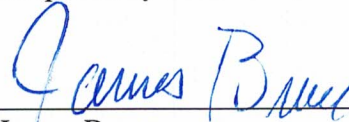
EST. TIME

EXHIBITS

**PROCEDURAL MATTERS**

If these cases are unopposed they will be submitted by affidavit. They should be consolidated for hearing.

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 10<sup>th</sup> day of January, 2023 by e-mail:

- Michael Feldewert - [mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)
- Adam Rankin - [agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)
- Julia Broggi - [jbroggi@hollandhart.com](mailto:jbroggi@hollandhart.com)
- Paula Vance - [pmvance@hollandhart.com](mailto:pmvance@hollandhart.com)
- James Parrot - [jparrot@bwenergylaw.com](mailto:jparrot@bwenergylaw.com)
- Ocean Munds-Dry - [ocean@conocophillips.com](mailto:ocean@conocophillips.com)
- Elizabeth Ryan - [beth@conocophillips.com](mailto:beth@conocophillips.com)
- Joby.Rittenhouse - [joby.rittenhouse@conocophillips.com](mailto:joby.rittenhouse@conocophillips.com)
- Earl DeBrine - [edebrine@modrall.com](mailto:edebrine@modrall.com)
- Deana Bennett - [dmb@modrall.com](mailto:dmb@modrall.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 174799

**QUESTIONS**

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 174799
	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>