

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

**APPLICATION OF MEWBOURNE OIL COMPANY FOR COMPULSORY  
POOLING AND TO VACATE DIVISION POOLING ORDERS R-22377  
AND R-22378, LEA COUNTY, NEW MEXICO.**

**CASE NO. 23317**

**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.  
Paula M. Vance, Esq.  
Holland & Hart LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile

**OTHER PARTIES**

None

**ATTORNEY**

**APPLICANT’S STATEMENT OF CASE**

Mewbourne seeks an order (a) pooling all uncommitted interests in the Bone Spring formation underlying a non-standard 640-acre, more or less, horizontal spacing unit comprised of the E2 of Sections 15 and 10, Township 18 South, Range 33 East, NMPM, Lea County, New Mexico, and (b) upon approval of this application vacating Division pooling Orders R-22377 and R-22378. This 640-acre non-standard horizontal well spacing unit in the Mescalero Escarpe; Bone

Spring Pool (Pool Code 45793) has been approved by the Division under Administrative Order NSP-2144.

The approved non-standard horizontal well spacing unit will be initially dedicated to the proposed **Bravos 15-10 B2OB Fed Com 1H** and **Bravos 15 10 B2PA Federal Com 1H** wells to be horizontally drilled from a surface location in the SE4SE4 (Unit P) of Section 15 to bottom hole locations, respectively, in NW4NE4 (Unit B) and the NE4NE4 (Unit A) of Section 10. 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.

The Division has previously issued the following pooling orders for this acreage: In Case 22953 the Division issued Order R-22377 pooling the W2E2 of Sections 15 and 10, and in Case 22954 the Division issued Order R-22378 pooling the E2E2 of Section 15 and 10. Upon approval of the pooling sought in this matter, Mewbourne requests that these prior orders be vacated.

**APPLICANT’S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Tyler Jolly, Landman	Affidavit	Approx. 6
Jordan Carrell, 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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Adam G. Rankin  
Julia Broggi  
Paula M. Vance  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
jbroggi@hollandhart.com  
pmvance@hollandhart.com

**ATTORNEYS FOR MEWBOURNE OIL COMPANY**

**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 180112

**QUESTIONS**

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 180112
	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>