

**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  
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(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

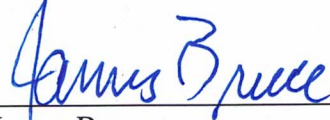
EST. TIME

EXHIBITS

**PROCEDURAL MATTERS**

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

Respectfully submitted,



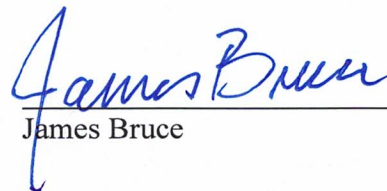
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Attorney for Mewbourne Oil Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 30th day of March, 2023 by e-mail:

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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 202467

**QUESTIONS**

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 202467
	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	Not answered.
Testimony time (in minutes)	Not answered.