## 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.

<b>CASE</b>	NO.				

## <u>APPLICATION</u>

Mewbourne Oil Company ("Applicant") (OGRID No. 14744), through its undersigned attorneys, hereby files this application with the Oil Conservation Division for an order pooling a 311.76-acre, more or less, standard horizontal well spacing unit in the Bone Spring formation underlying the S2S2 of Sections 19 and 20, Township 18 South, Range 29 East, NMPM, Eddy County, New Mexico. In support Applicant states:

- 1. Applicant is a working interest owner in the proposed horizontal spacing unit and has the right to drill thereon.
- 2. Applicant seeks to initially dedicate the proposed spacing unit to the proposed **Pretty Bird 20/19 Fed Com 528H** and the **Pretty Bird 20/19 Fed Com 618H** wells to be horizontally drilled from a surface location in the SE4 of Section 20, with a first take point in the SE4SE4 (Unit P) of Section 20 and a last take point in the SW4SW4 equivalent (Lot 4) of irregular Section 19.
- 3. Applicant has sought and been unable to obtain voluntary agreement for the development of these lands from all the working interest owners in the subject spacing unit.
- 4. The pooling of interests will avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.

5. Approval of this application will allow the efficient recovery of the oil and gas reserves underlying the subject lands, and is in the best interest of conservation, the prevention of waste and the protection of correlative rights.

WHEREFORE, Applicant requests that this application be set for hearing before an Examiner of the Oil Conservation Division on November 2, 2023, and, after notice and hearing as required by law, the Division enter an order:

- A. Pooling all uncommitted interests in the horizontal spacing unit and approving the initial wells thereon;
- B. Designating Applicant as operator of the horizontal spacing unit and the horizontal wells to be drilled thereon;
- C. Authorizing Applicant to recover its costs of drilling, equipping, and completing the wells;
- D. Approving the actual operating charges and costs of supervision while drilling and after completion, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and
- E. Imposing a 200% charge for the risk assumed by Applicant in drilling and completing the wells against any working interest owner who does not voluntarily participate in the drilling of the wells.

Respectfully submitted,

**HOLLAND & HART LLP** 

By:

Michael H. Feldewert

Adam G. Rankin

Paula M. Vance

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

mhfeldewert@hollandhart.com

agrankin@hollandhart.com

pmvance@hollandhart.com

ATTORNEYS FOR MEWBOURNE OIL COMPANY

CASE :

Application of Mewbourne Oil Company for Compulsory Pooling, Eddy County, New Mexico. Applicant in the above-styled cause seeks an order pooling a 311.76-acre, more or less, standard horizontal well spacing unit in the Bone Spring formation underlying the S2S2 of Sections 19 and 20, Township 18 South, Range 29 East, NMPM, Eddy County, New This spacing unit will be initially dedicated to the proposed Pretty Bird 20/19 Fed Com 528H and the Pretty Bird 20/19 Fed Com 618H wells to be horizontally drilled from a surface location in the SE4 of Section 20, with a first take point in the SE4SE4 (Unit P) of Section 20 and a last take point in the SW4SW4 equivalent (Lot 4) of irregular Section 19. Also to be considered will be the cost of drilling and completing the wells and the allocation of the cost thereof, the operating costs and charges for supervision, the designation of applicant as operator of the proposed spacing unit, and a 200% charge for risk involved in drilling said wells. Said area is located approximately 18 miles southeast of Artesia, New Mexico.