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

APPLICATION OF MEWBOURNE OIL COMPANY TO ADD RECORD TITLE OWNERS TO COMPULSORY POOLING ORDER R-22854, LEA COUNTY, NEW MEXICO.

CASE NO. 24157 (formerly Case 23674)

APPLICATION OF MEWBOURNE OIL COMPANY TO ADD RECORD TITLE OWNERS TO COMPULSORY POOLING ORDER R-22855, LEA COUNTY, NEW MEXICO.

CASE NO. 24158 (formerly Case 23675)

MEWBOURNE OIL COMPANY'S CONSOLIDATED PRE-HEARING STATEMENT

Mewbourne Oil Company ("Mewbourne" or "Applicant"), the applicant in the above-

referenced matters, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the

Oil Conservation Division.

APPEARANCES

APPLICANT

Mewbourne Oil Company ("Mewbourne")

ATTORNEY

Michael H. Feldewert Adam G. Rankin Paula M. Vance Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile mfeldewert@hollandhart.com agrankin@hollandhart.com

APPLICANT'S STATEMENT OF THE CASE

In Case No. 24157, Mewbourne seeks an order to amend Order R-22854 ("Pooling Order") to add record title owners under the Pooling Order. Order R-22854 was issued on September 1, 2023, in Case 23674 and pooled the mineral owners in a 321.07 horizontal spacing unit in the Bone Spring formation [Lusk; Bone Spring North Pool (41450)] underlying the N/2 N/2 of Section 29, and the N/2 NE/4, NE/4 NW/4 and Lot 1 (NW/4 NW/4 equivalent) of irregular Section 30, Township 18 South, Range 32 East, NMPM, Lea County, New Mexico. This spacing unit is initially dedicated to the proposed **Thundercloud 29/30 B2AD Fed Com 1H** well to be horizontally drilled from a surface location in the NW/4 NW/4 of Section 28, with a first take point in the NE/4 NE/4 (Unit A) of Section 29 and a last take point in the NW/4 NW/4 equivalent (Lot 1) of irregular Section 30.

In Case No. 24158, Mewbourne seeks an order to amend Order R-22855 ("Pooling Order") to add record title owners under the Pooling Order. Order R-22855 was issued on September 1, 2023, in Case 23675 and pooled the mineral owners in a 321.09 horizontal spacing unit in the Bone Spring formation [Lusk; Bone Spring North Pool (41450)] underlying the S/2 N/2 of Section 29, and the S/2 NE/4, SE/4 NW/4 and Lot 2 (SW/4 NW/4 equivalent) of irregular Section 30, Township 18 South, Range 32 East, NMPM, Lea County, New Mexico. This spacing unit is initially dedicated to the proposed Thundercloud 29/30 B2HE Fed Com 1H well to be horizontally drilled from a surface location in the NW/4 NW/4 of Section 28, with a first take point in the SE/4 NE/4 (Unit H) of Section 29 and a last take point in the SW/4 NW/4 equivalent (Lot 2) of irregular Section 30.

Applicant has sought and been unable to obtain the signatory approval of all the record title owners in the two federal leases covering the subject spacing units, NMNM 009016 and NMNM

106717. Adding these record title owners to the existing Pooling Orders will allow applicant to proceed with the development of the subject acreage and thereby avoid the drilling of unnecessary wells, prevent waste, and protect correlative rights.

APPLICANT'S PROPOSED EVIDENCE

WITNESS	ESTIMATED TIME	EXHIBITS
Name and Expertise		

Thomas Sloan, Landman

Self-Affirmed Statement

Approx. 2

PROCEDURAL MATTERS

Mewbourne intends to present this case by self-affirmed statement if there is no opposition

at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

By: _ Fakhih

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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

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Action 319088

QUESTIONS

Operator:	OGRID:
MEWBOURNE OIL CO	14744
P.O. Box 5270	Action Number:
Hobbs, NM 88241	319088
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witnesses		Not answered.
Testimony time (in minutes)		Not answered.