

**CASE NO. 24337**

**APPLICATION OF MEWBOURNE OIL COMPANY  
FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO**

EXHIBITS – Part II

3. Geologist's Affidavit
  - 3-A: Locator Plat
  - 3-B and 3-C: Structure Maps
  - 3-D and 3-E: Cross-Sections
  - 3-F: Horizontal Drilling Plans
  
4. Affidavit of Mailing
  - 4-A: Notice Letter
  
5. Application and Proposed Notice

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 No. 24337

SELF-AFFIRMED STATEMENT OF JUSTIN ROEDER

Justin Roeder deposes and states:

1. I am over the age of 18, and have personal knowledge of the matters stated herein.
2. I am a geologist for Mewbourne Oil Company ("Mewbourne"), and I am familiar with the geological matters involved in these cases. I have been qualified by the Division as an expert petroleum geologist.
3. The following plats are attached hereto:
  - (a) Exhibit 3-A is an area locator plat.
  - (b) Exhibit 3-B is a structure map on the top of the Second Bone Spring Sand in the area around Sections 22 and 15, Township 26 South, Range 32 East, NMPM, and Exhibit 3-C is a structure map on the top of the Third Bone Spring Shale in the area around Sections 22 and 15. It shows that structure dips gently to the east. They also show existing and proposed Second Bone Spring Sand and Third Bone Spring Shale wells in the area. They also show a north-south line of cross-section.
  - (c) Exhibit 3-D is a north-south cross section of the Second Bone Spring Sand, and Exhibit 3-E is a north-south cross section of the Third Bone Spring Shale. The logs on the cross-sections give a representative sample of the Second Bone Spring Sand and Third Bone Spring Shale in this area. The zones are continuous and of relatively uniform thickness across the well units.
4. I conclude from the maps that:
  - (a) The proposed horizontal Bone Spring spacing unit is justified from a geologic standpoint.
  - (b) The target zones are continuous and of uniform thickness across the well unit.
  - (c) Each quarter section in the well unit will contribute more or less equally to production from a well.

EXHIBIT 3

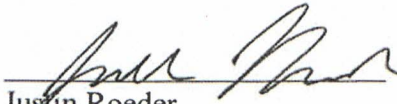
(d) There is no faulting or other geologic impediment in the area which will affect the drilling of the subject wells.

5. Other Bone Spring wells drilled in this area show standup well units are preferred. In adjoining Sections 14 and 23 there are existing standup wells which show it is a reasonable way to develop the reservoir.

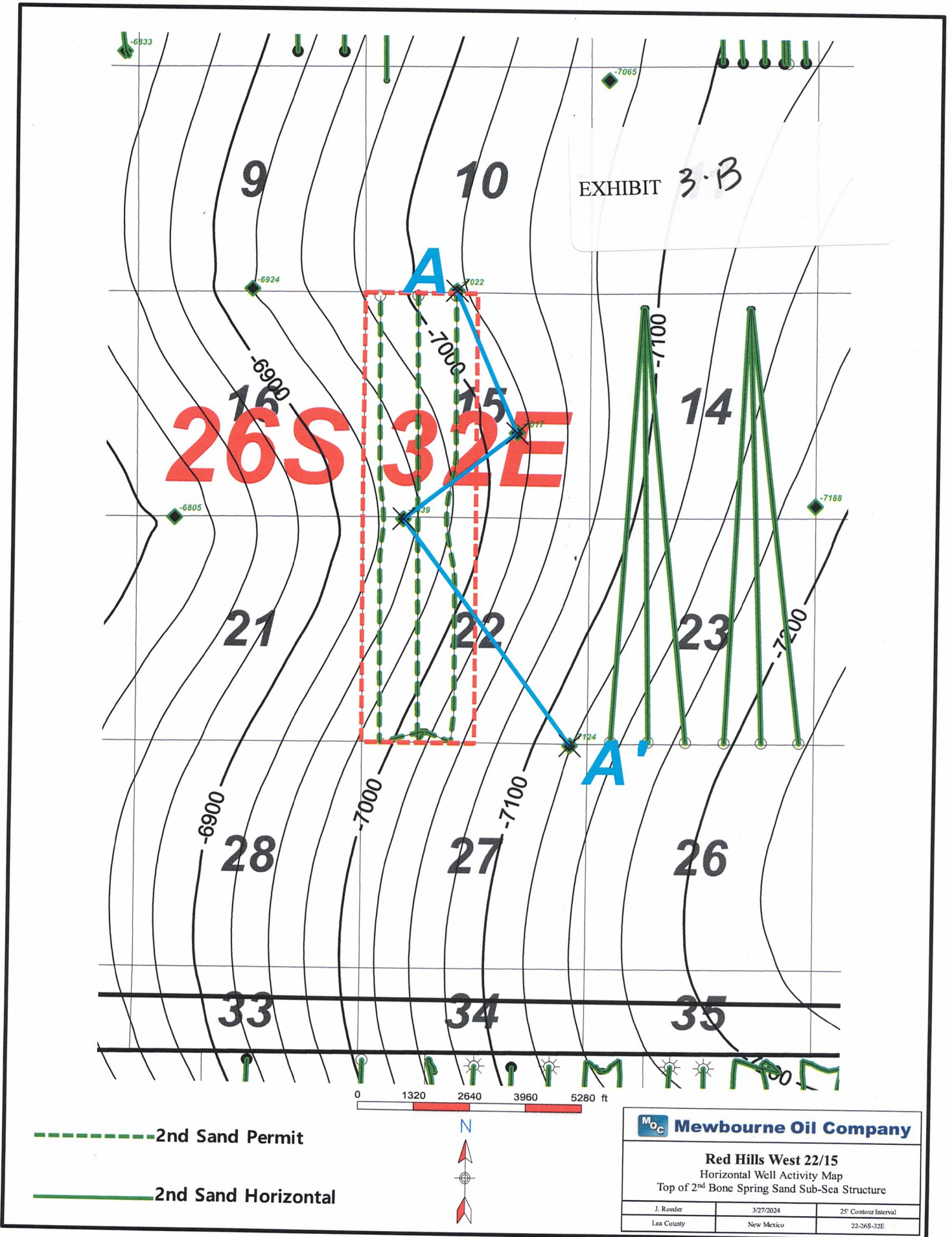
6. Exhibit 3-F contains copies of the horizontal drilling plans for the subject wells. The well locations are orthodox.

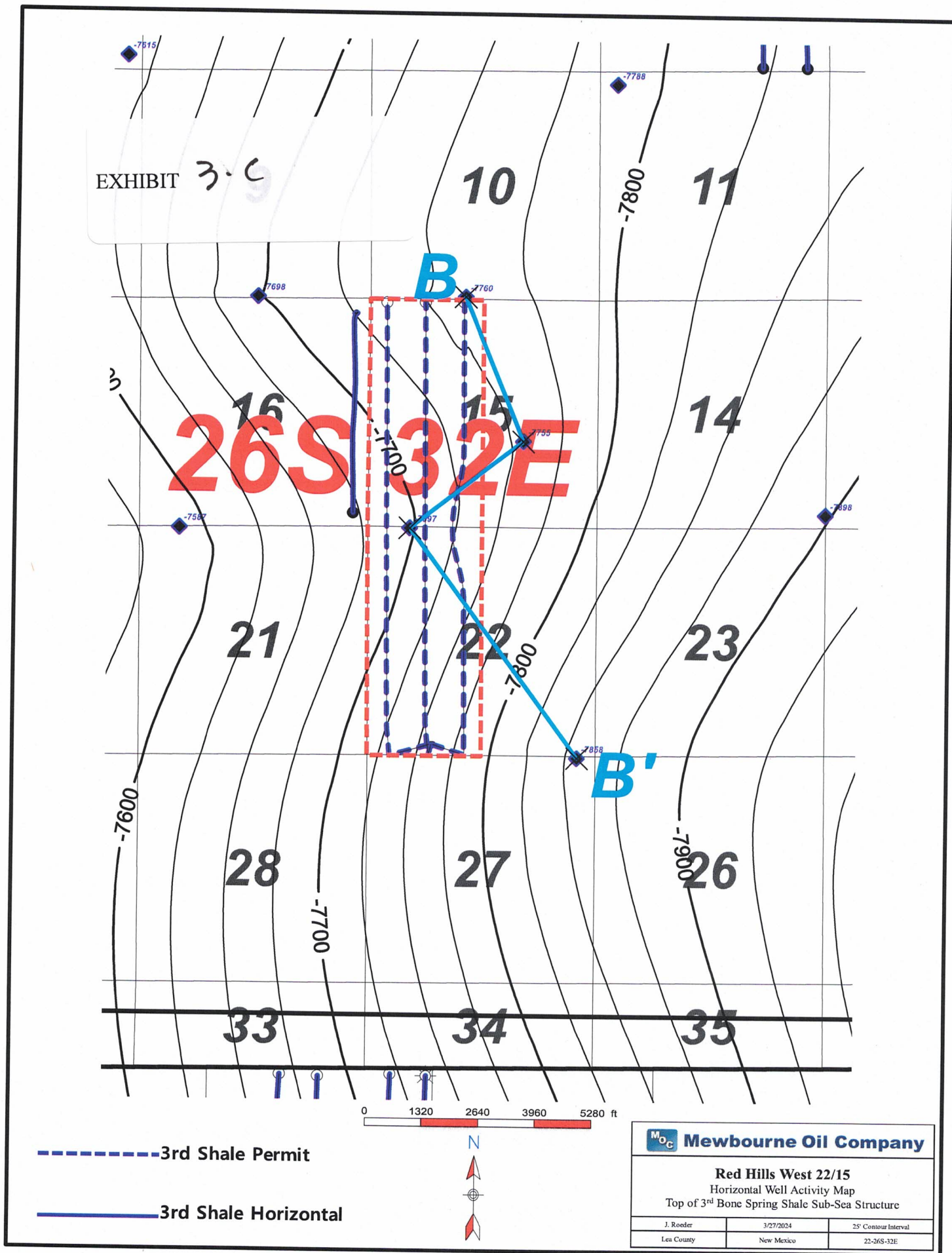
I understand that this Self-Affirmed Statement will be used as written testimony in these cases. I affirm that my testimony in paragraphs 1 through 6 above is true and correct and is made under penalty of perjury under the laws of the State of New Mexico. My testimony is made as of the date written next to my signature below.

Date: 4/2/2024

  
Justin Roeder







# Red Hills West 22/15 - 2nd Sand Area X-Section

**A**

**A'**

MEWBOURNE OIL CO  
 RED HILLS WEST UNIT 017H  
 150 FSL 1250 FWL  
 TWP: 26 S - Range: 32 E - Sec. 10  
 Datum=3246.00  
 Reference=KB  
 Status=OIL

CHEVRON U S A INC  
 MAELSTROM SWD 001  
 2050 FSL 1793 FWL  
 TWP: 26 S - Range: 32 E - Sec. 15  
 Datum=3200.00  
 Reference=KB  
 Status=SWDOP

MEWBOURNE OIL CO  
 RED HILLS WEST 22 W 003H  
 185 FNL 820 FWL  
 TWP: 26 S - Range: 32 E - Sec. 22  
 Datum=3174.00  
 Reference=KB  
 Status=GAS

CONOCOPHILLIPS CO  
 BATTLE AXE 27 FEDER 001H  
 250 FNL 245 FWL  
 TWP: 26 S - Range: 32 E - Sec. 27  
 Datum=3145.00  
 Reference=KB  
 Status=OIL

3671 ft

30025451270000

3360 ft

30025429110000

6669 ft

30025428950000

## 10M-26S-32E

## 15J-26S-32E

## 22D-26S-32E

## 27A-26S-32E

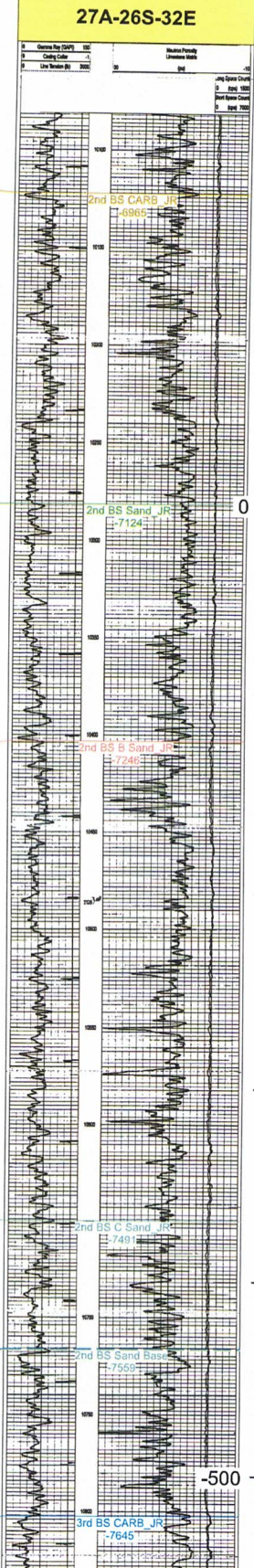
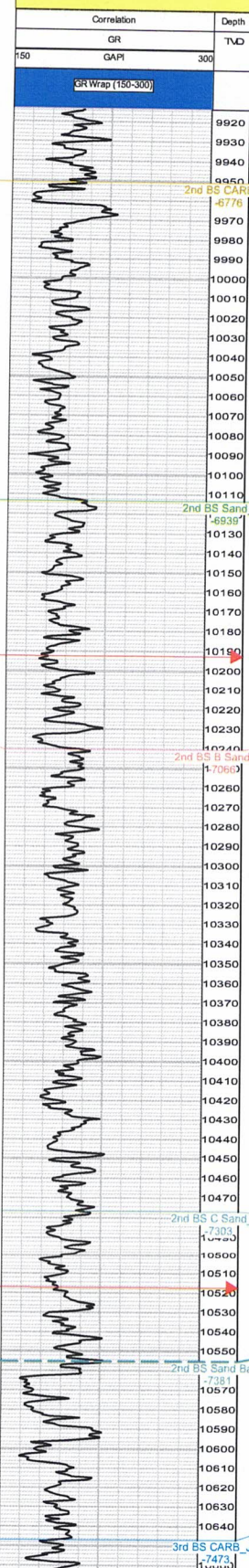
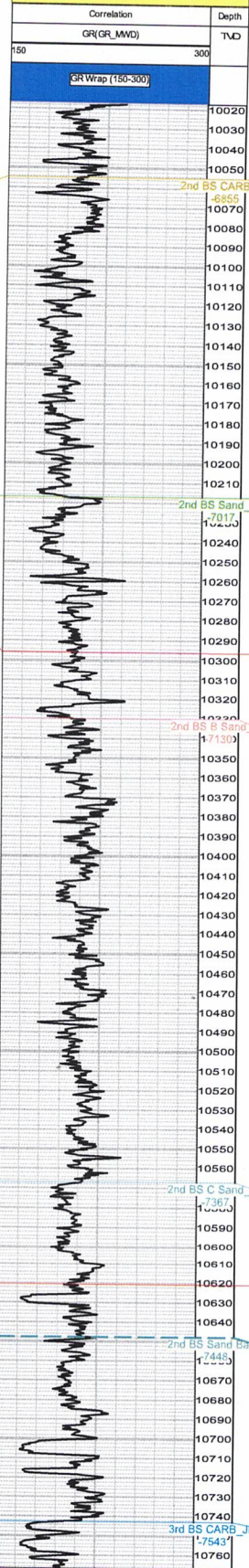
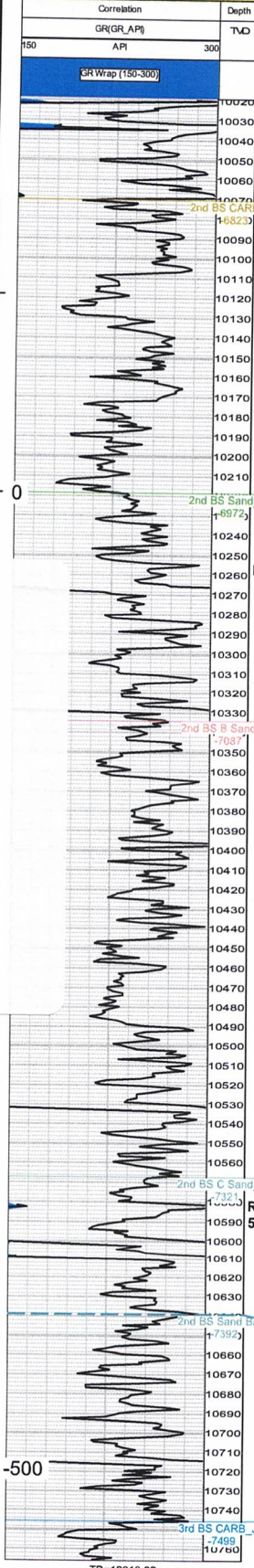


EXHIBIT 3-D

# Red Hills West 22/15 - 3rd Shale Area X-Section

**B**

**B'**

MEWBOURNE OIL CO  
 RED HILLS WEST UNIT 017H  
 150 FSL 1250 FWL  
 TWP: 26 S - Range: 32 E - Sec. 10  
 Datum=3246.00  
 Reference=KB  
 Status=OIL

CHEVRON U S A INC  
 MAELSTROM SWD 001  
 2050 FSL 1793 FEL  
 TWP: 26 S - Range: 32 E - Sec. 15  
 Datum=3200.00  
 Reference=KB  
 Status=SWDOP

MEWBOURNE OIL CO  
 RED HILLS WEST 22 W 003H  
 185 FNL 820 FWL  
 TWP: 26 S - Range: 32 E - Sec. 22  
 Datum=3174.00  
 Reference=KB  
 Status=GAS

CONOCOPHILLIPS CO  
 BATTLE AXE 27 FEDER 001H  
 250 FNL 245 FEL  
 TWP: 26 S - Range: 32 E - Sec. 27  
 Datum=3145.00  
 Reference=KB  
 Status=OIL

3648 ft

30025451270000

3328 ft

30025429110000

6662 ft

30025428950000

## 10M-26S-32E

## 15J-26S-32E

## 22D-26S-32E

## 27A-26S-32E

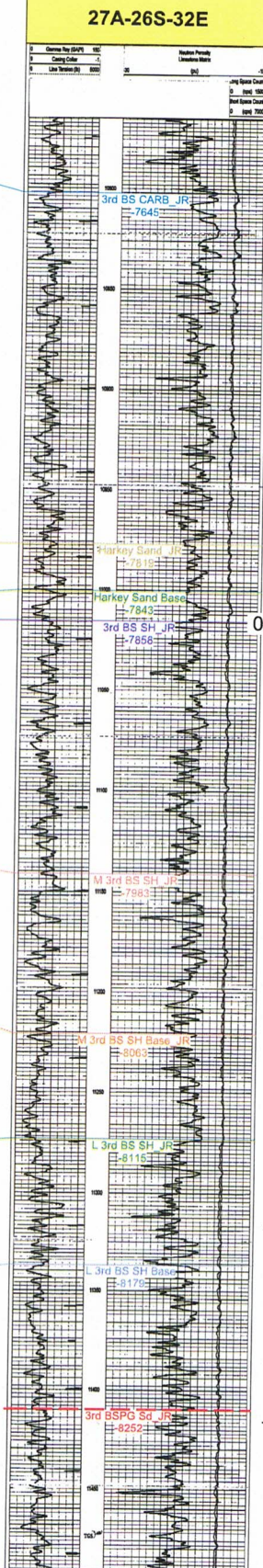
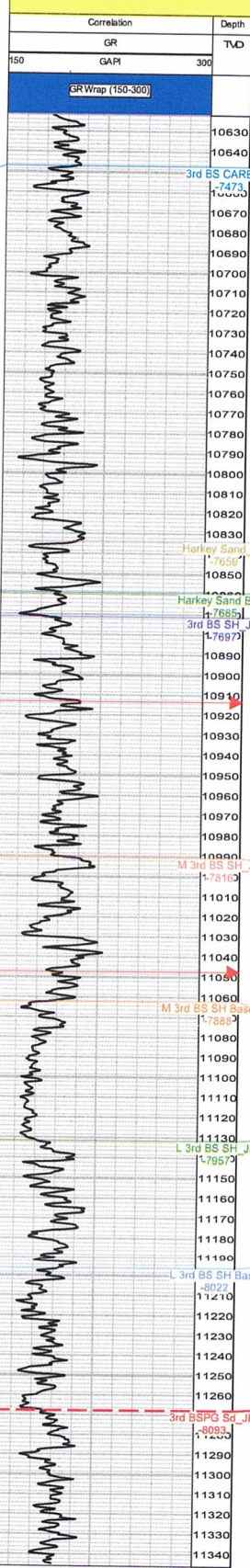
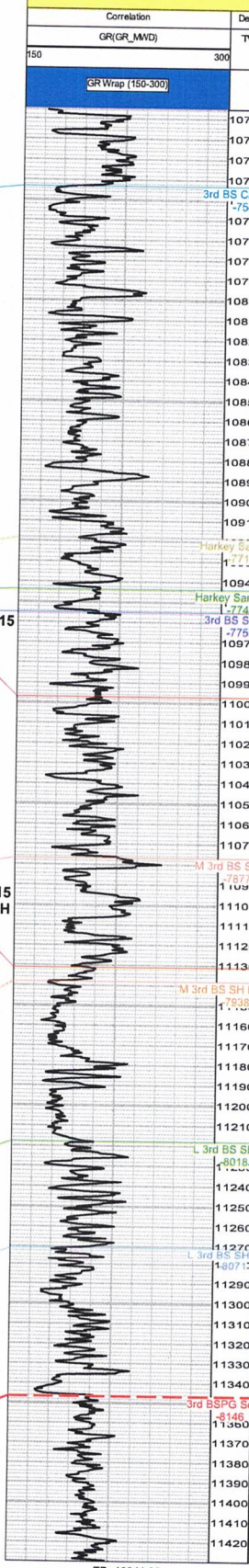
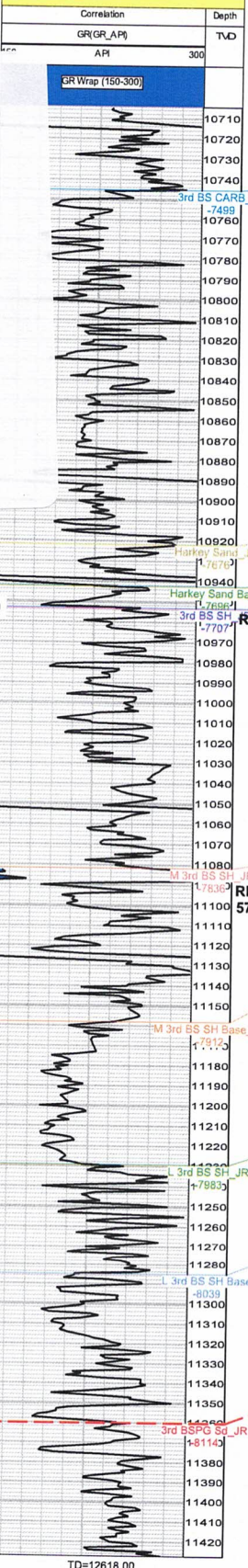


EXHIBIT 3-E

TD=12618.00

TD=18941.00

TD=16890.00

TD=19105.00



HIBIT 3.F



Site: Red Hills West 22-15 Pad  
Well: Red Hills West 22-15 Fed Com #521H  
Wellbore: OH  
Design: Plan #3  
Lat: 32.021557  
Long: -103.666750  
GCS: 3137.00  
KB: KB=28 @ 3165.00usft (Patterson 595)



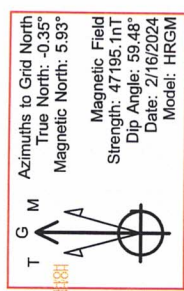
WELL DETAILS: Red Hills West 22-15 Fed Com #521H			
+N/-S	+E/-W	Northing	Eastings
0.00	0.00	372218.59	747923.97
		Latitude	Longitude
		32.021557	-103.666750

WELLBORE TARGET DETAILS (LAT/LONG)			
Name	TVD	+N/-S	+E/-W
RHW #521H - P2 - BB	10002.10	-248.18	-1008.06
RHW #521H - P2 - PBHL	10494.50	10341.51	-1086.57
RHW #521H - P2 - T1	10536.90	5069.31	-947.47

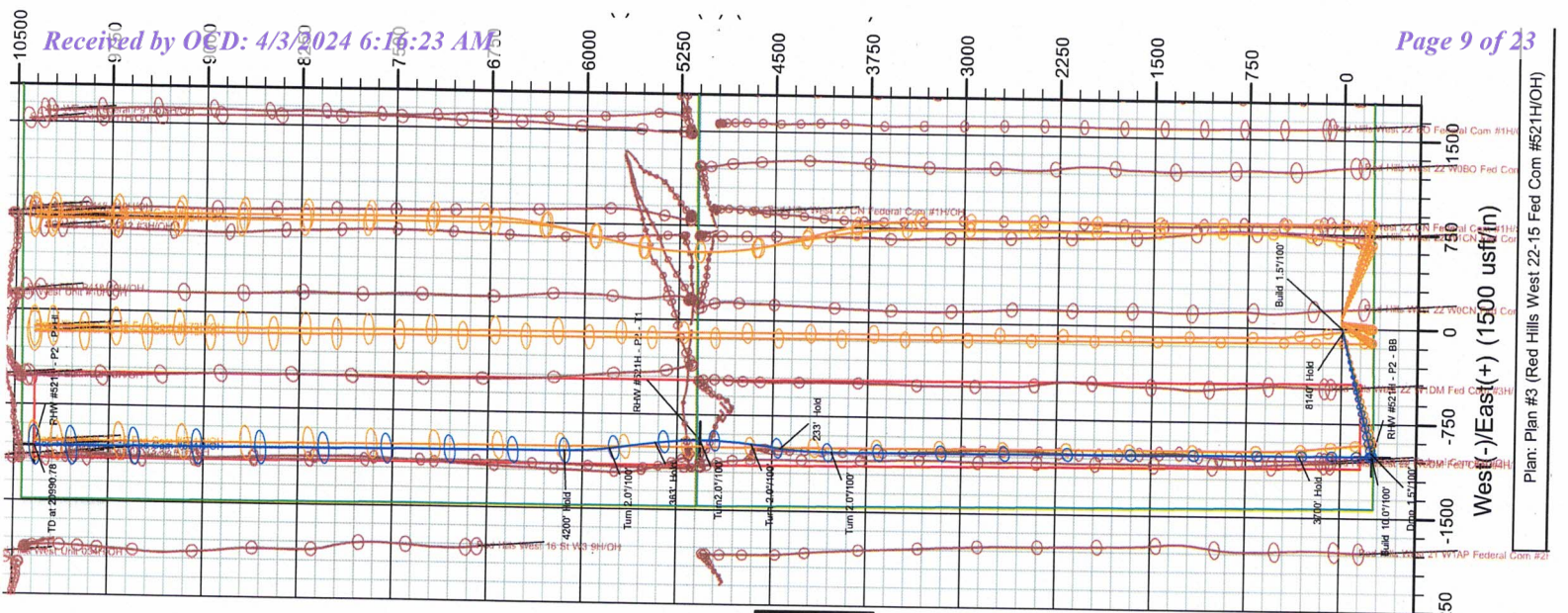
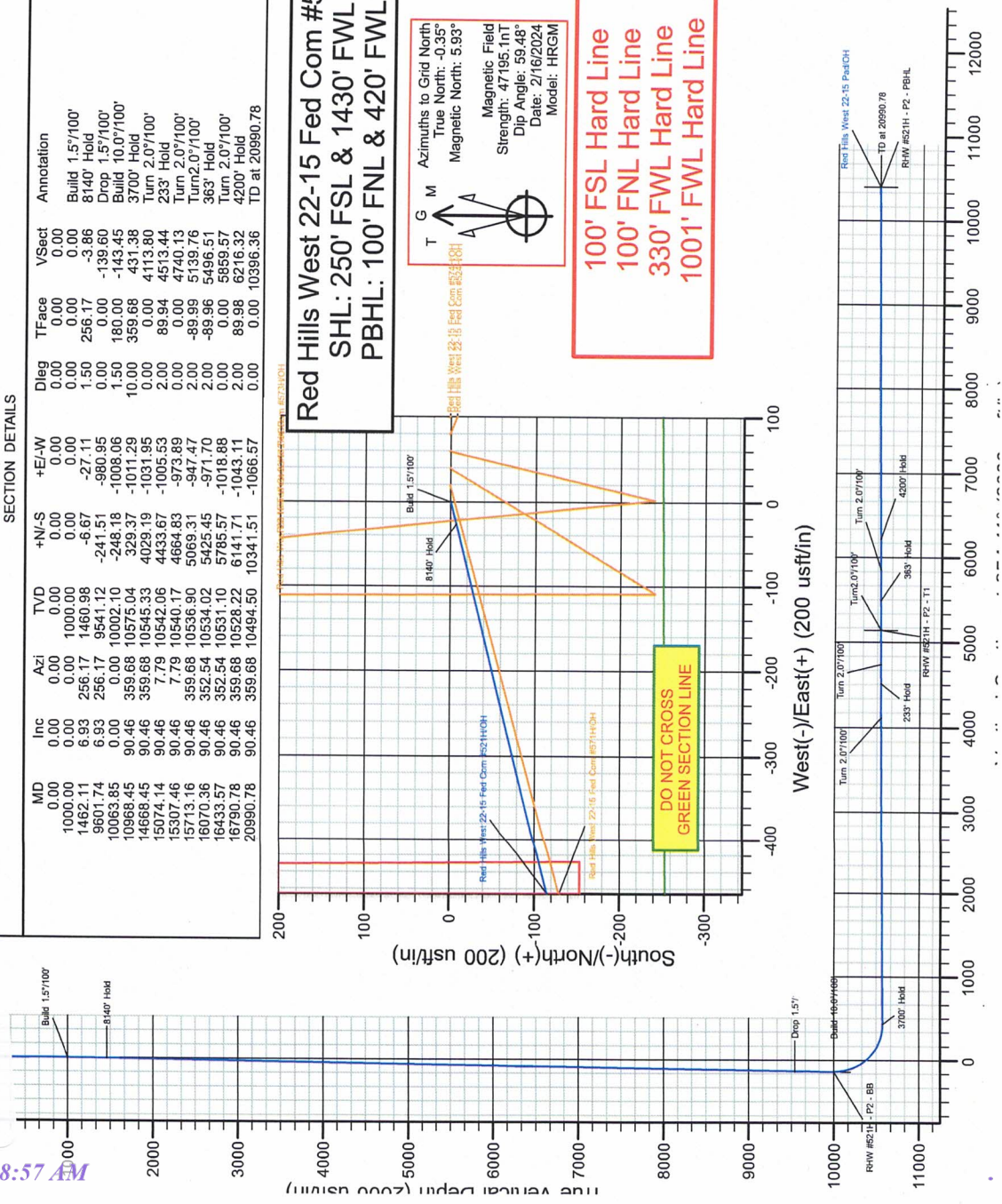
SECTION DETAILS									
MD	Inc	Azi	TVD	+N/-S	+E/-W	Dleg	TFace	VFace	Annotation
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	Build 1.57/100'
1000.00	0.00	0.00	1000.00	0.00	0.00	0.00	0.00	0.00	8140' Hold
1462.11	6.93	256.17	1460.98	-6.67	-27.11	1.50	256.17	-3.86	Drop 1.57/100'
9601.74	6.93	256.17	9541.12	-241.51	-980.95	0.00	0.00	-139.60	Build 10.07/100'
10063.85	0.00	0.00	10002.10	-248.18	-1008.06	1.50	180.00	-143.45	3700' Hold
10968.45	90.46	359.68	10575.04	329.37	-1011.29	10.00	359.68	431.38	Turn 2.07/100'
14668.45	90.46	359.68	10545.33	4029.19	-1031.95	2.00	89.94	4513.44	233' Hold
15074.14	90.46	7.79	10540.17	4664.83	-973.89	0.00	0.00	4740.13	Turn 2.07/100'
15307.46	90.46	359.68	10536.90	5069.31	-947.47	2.00	-89.99	5139.76	363' Hold
16070.36	90.46	352.54	10534.02	5425.45	-871.70	0.00	-89.96	5496.51	Turn 2.07/100'
16433.57	90.46	352.54	10531.10	5765.57	-1018.88	0.00	89.98	6216.32	Turn 2.07/100'
16790.78	90.46	359.68	10528.22	6141.71	-1043.11	2.00	89.98	6216.32	4200' Hold
20990.78	90.46	359.68	10494.50	10341.51	-1066.57	0.00	0.00	10396.36	TD at 20990.78

**Red Hills West 22-15 Fed Com #521H**  
**SHL: 250' FSL & 1430' FWL**  
**PBHL: 100' FNL & 420' FWL**



**100' FSL Hard Line**  
**100' FNL Hard Line**  
**330' FWL Hard Line**  
**1001' FWL Hard Line**

**DO NOT CROSS GREEN SECTION LINE**





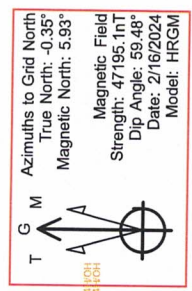
Site: Red Hills West 22-15 Pad  
 Well: Red Hills West 22-15 Fed Com #571H  
 Wellbore: OH  
 Design: Plan #2  
 Lat: 32.021557  
 Long: -103.666886  
 GL: 3136.00  
 KB: KB-28 @ 3164.00usft (Patterson 595)



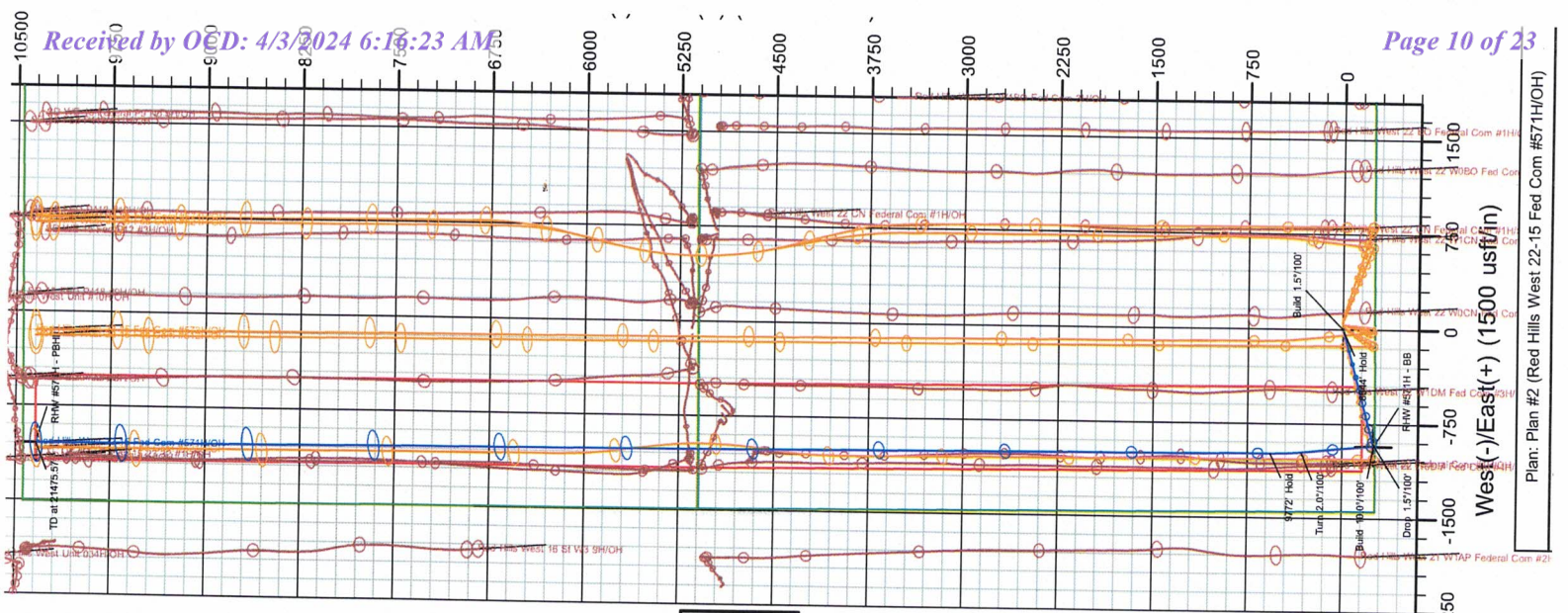
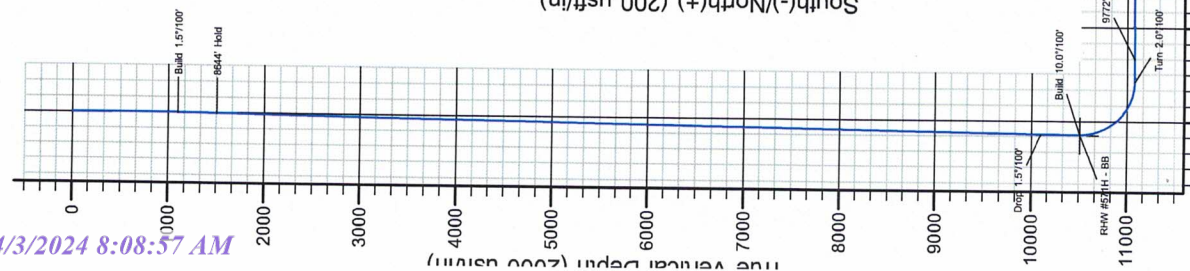
WELL DETAILS: Red Hills West 22-15 Fed Com #571H			
+N/-S	+E/-W	Northing	Easting
0.00	0.00	372218.76	747943.97
WELLBORE TARGET DETAILS (LAT/LONG)			
Name	TVD	+N/-S	+E/-W
RHW #571H - BB	10506.05	-247.46	-928.06
RHW #571H - PBHL	11024.00	10341.64	-1046.57

SECTION DETAILS									
MD	Inc	Azi	TVD	+N/-S	+E/-W	Dleg	TFace	VSect	Annotation
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
1100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	Build 1.5'/100'
1506.13	6.09	1505.36	-5.56	-20.84	0.00	1.50	255.07	-3.43	8644' Hold
10150.27	6.09	10100.69	-241.90	-907.22	0.00	0.00	0.00	-149.33	Drop 1.5'/100'
10556.39	0.00	0.00	10506.05	-247.46	-928.06	1.50	180.00	-152.76	Build 10.07/100'
11459.49	90.31	354.80	11079.00	-326.23	-980.27	10.00	354.80	423.27	Turn 2.07/100'
11703.50	90.31	359.68	11077.67	-569.87	-992.01	2.00	89.93	666.85	9772' Hold
21475.57	90.31	359.68	11024.00	10341.64	-1046.57	0.00	0.00	10394.46	TD at 21475.57

**Red Hills West 22-15 Fed Com #571H**  
 SHL: 250' FSL & 1450' FWL  
 PBHL: 100' FNL & 460' FWL



**100' FSL Hard Line**  
**100' FNL Hard Line**  
**330' FWL Hard Line**  
**1001' FWL Hard Line**





Site: Red Hills West 22-15 Pad  
 Well: Red Hills West 22-15 Fed Com #512H  
 Wellbore: OH  
 Design: Plan #2  
 Lat: 32.021557  
 Long: -103.666621  
 GL: 3136.00  
 KB: KB-28 @ 3164.00usft (Patterson 595)



WELL DETAILS: Red Hills West 22-15 Fed Com #512H

+N/-S	+E/-W	Northing	Easting	Latitude	Longitude
0.00	0.00	372218.92	747963.97	32.021557	-103.666621

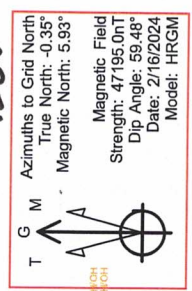
WELLBORE TARGET DETAILS (LAT/LONG)

Name	TVD	+N/-S	+E/-W	Northing	Easting	Shape
RHW #512H - BB	9671.05	-241.21	-148.09	371977.71	747815.88	Point
RHW #512H - PBHL	10199.00	10348.58	-206.77	382587.50	747757.20	Point

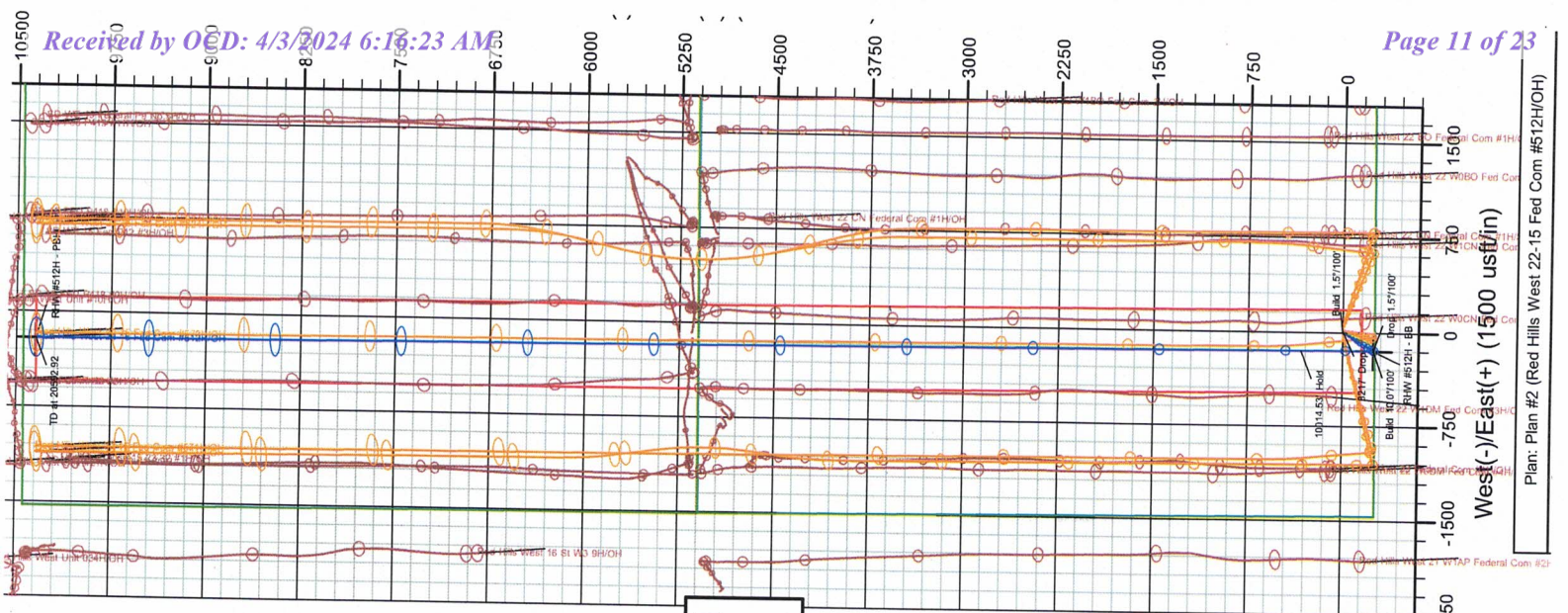
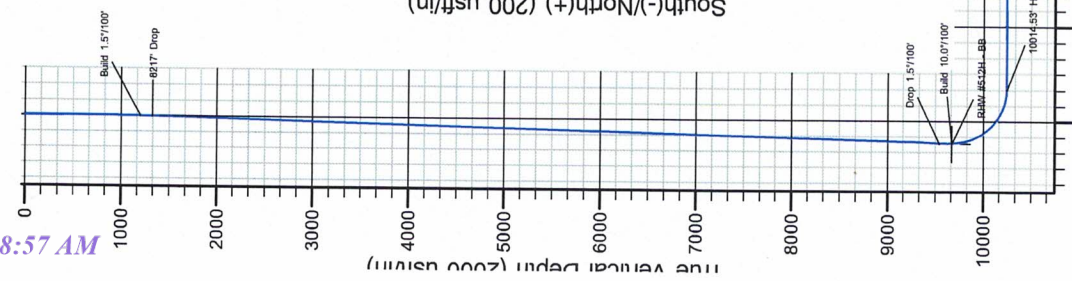
SECTION DETAILS

MD	Inc	Azi	TVD	+N/-S	+E/-W	Dleg	TFace	VSect	Annotation
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	Build 1.57/100'
1200.00	0.00	0.00	1200.00	0.00	0.00	0.00	0.00	0.00	8217' Drop
1329.56	1.94	211.55	1329.54	-1.87	-1.15	1.50	211.55	-1.85	Drop 1.57/100'
9546.27	1.94	211.55	9541.51	-236.34	-146.94	0.00	0.00	0.00	Build 10.0'/100'
9675.83	0.00	0.00	9671.05	-241.21	-148.09	1.50	180.00	-236.20	Build 10.0'/100'
10578.40	90.26	359.68	10244.00	334.31	-151.28	10.00	359.68	337.27	10014.53' Hold
20592.92	90.26	359.68	10199.00	10348.58	-206.77	0.00	0.00	10350.65	TD at 20592.92

Red Hills West 22-15 Fed Com #512H  
 SHL: 250' FSL & 1470' FWL  
 PBHL: 100' FNL & 1320' FWL  
 1280



100' FSL Hard Line  
 100' FNL Hard Line  
 990' FWL Hard Line  
 1650' FWL Hard Line



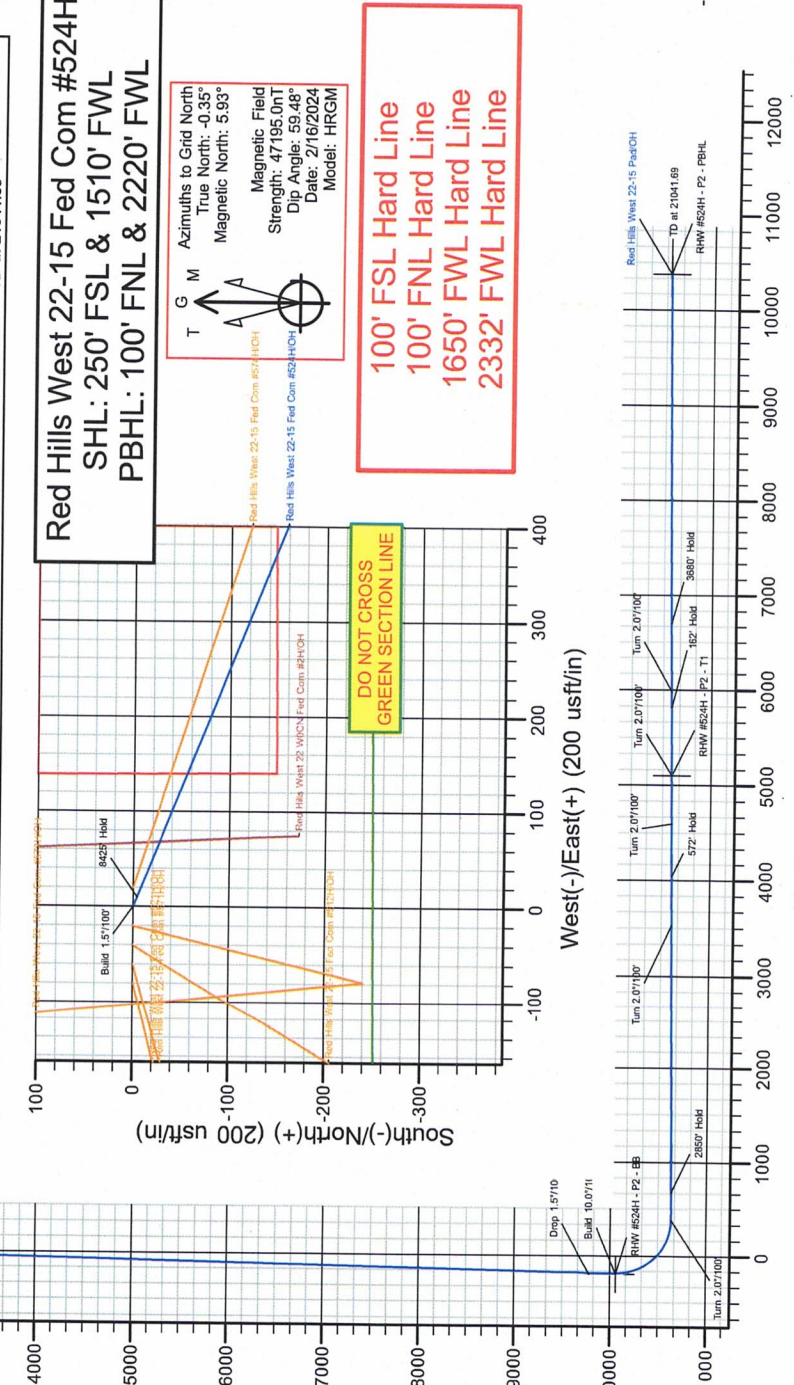


Site: Red Hills West 22-15 Pad  
 Well: Red Hills West 22-15 Fed Com #524H  
 Wellbore: OH  
 Design: Plan #3  
 Lat: 32.021558  
 Long: -103.666492  
 CL: 3136.00  
 KB: KB-28 @ 3164.00usft (Patterson 595)



WELL DETAILS: Red Hills West 22-15 Fed Com #524H			
+N/-S	+E/-W	Northing	Easting
0.00	0.00	372219.24	748003.96
WELLBORE TARGET DETAILS (LAT/LONG)			
Name	TVD	+N/-S	+E/-W
RHW #524H - P2 - BB	10061.60	-234.84	631.89
RHW #524H - P2 - PBHL	10543.10	10355.66	653.04
RHW #524H - P2 - T1	10591.20	5084.44	459.74

SECTION DETAILS									
MD	Inc	Azi	TVD	+N/-S	+E/-W	Dleg	TFace	VSect	Annotation
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	Build 1.57/100'
1100.00	0.00	0.00	1100.00	0.00	0.00	0.00	0.00	0.00	8425' Hold
1379.81	4.20	111.65	1379.56	-3.78	9.52	1.50	111.65	-3.17	Drop 1.57/100'
9804.88	4.20	111.65	9782.04	-231.32	582.63	0.00	0.00	-194.19	Build 10.07/100'
10084.69	0.00	0.00	10081.60	-235.10	592.15	1.50	180.00	-197.37	Build 10.07/100'
10084.70	0.00	0.00	10081.60	-235.10	592.15	0.00	0.00	-197.37	Build 10.07/100'
10989.90	90.52	5.90	10634.53	340.00	651.58	10.00	5.90	380.33	Turn 2.07/100'
11288.93	90.52	359.92	10631.82	638.49	666.75	2.00	-89.97	679.19	2850' Hold
14138.93	90.52	359.92	10605.95	3488.37	662.73	0.00	0.00	3523.17	Turn 2.07/100'
14665.13	90.53	349.39	10601.14	4011.53	613.80	2.00	-88.92	4042.20	572' Hold
15236.63	90.53	349.39	10595.90	4573.24	508.63	0.00	0.00	4596.19	Turn 2.07/100'
15750.87	90.52	359.68	10591.20	5084.44	459.74	2.00	89.98	5103.29	Turn 2.07/100'
16475.32	90.52	14.17	10584.58	5601.66	546.85	2.00	89.93	5624.58	162' Hold
16637.24	90.52	14.17	10583.11	5958.65	586.48	0.00	0.00	5983.74	Turn 2.07/100'
17361.69	90.52	359.68	10576.50	6675.87	673.59	2.00	-89.94	6705.03	3680' Hold
21041.69	90.52	359.68	10543.10	10355.66	653.04	0.00	0.00	10376.23	TD at 21041.69





**MEWBOURNE**  
**OIL COMPANY**

Site: Red Hills West 22-15 Fed Com #574H  
Well: Red Hills West 22-15 Fed Com #574H  
Wellbore: OH  
Design: Plan #2  
Lat: 32.021558  
Long: -103.666428  
GL: 3136.00  
KB: KB=28 @ 3164.00usft (Patterson 595)



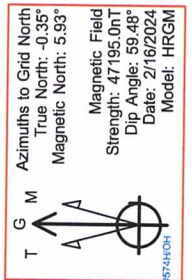
WELL DETAILS: Red Hills West 22-15 Fed Com #574H			
+N/-S	+E/-W	Northing	Easting
0.00	0.00	372219.41	748023.96
		Latitude	Longitude
		32.021558	-103.666428

WELLBORE TARGET DETAILS (LAT/LONG)			
Name	TVD	+N/-S	+E/-W
RHW #574 - BB	9500.00	-234.07	731.89
RHW #574 - PBHL	11053.80	10355.79	673.04
RHW #574 - T1	11093.50	5084.35	439.74

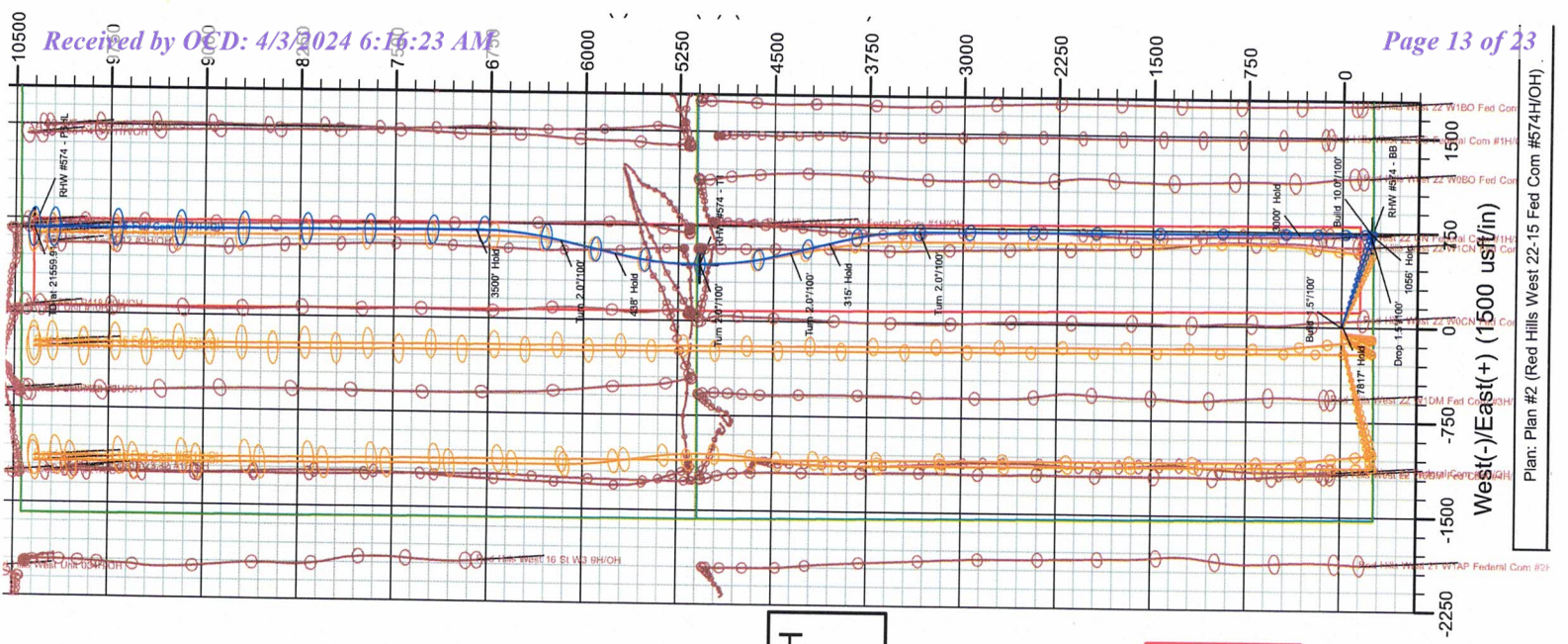
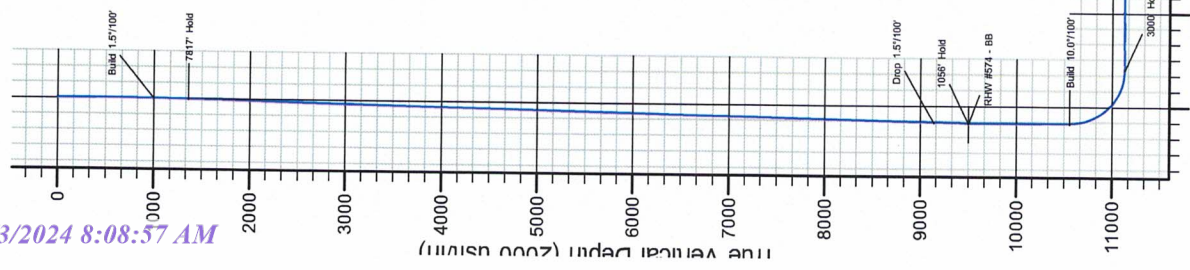
SECTION DETAILS									
MD	Inc	Azi	TVD	+N/-S	+E/-W	Dleg	TFace	VSect	Annotation
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
1000.00	0.00	0.00	1000.00	0.00	0.00	0.00	0.00	0.00	Build 1.57/100'
1359.50	5.39	107.74	1358.97	-5.15	16.10	107.74	-4.09	0.00	7817' Hold
9176.15	5.39	107.74	9141.03	-228.92	715.79	0.00	-182.02	0.00	Drop 1.57/100'
9535.66	0.00	0.00	9500.00	-234.07	731.89	1.50	180.00	-186.11	1056' Hold
10592.06	0.00	0.00	10556.40	-234.07	731.89	0.00	0.00	-186.11	Build 10.07/100'
11496.36	90.43	359.68	11129.34	343.18	728.67	10.00	359.68	389.71	3000' Hold
14496.36	90.43	359.68	11106.83	3343.05	711.91	0.00	0.00	382.18	Turn 2.07/100'
15223.25	90.43	345.14	11101.34	4061.62	616.17	2.00	-89.95	4093.03	315' Hold
15537.93	90.43	345.14	11098.96	4365.77	535.46	0.00	0.00	4391.31	Turn 2.07/100'
16264.83	90.43	359.68	11088.41	5084.35	439.74	2.00	89.94	5102.17	Turn 2.07/100'
16943.34	90.43	13.25	11088.16	5756.95	515.96	2.00	89.97	5776.29	438' Hold
17381.40	90.43	359.68	11085.07	6183.34	616.37	0.00	0.00	6210.30	Turn 2.07/100'
18059.91	90.43	359.68	11080.16	6855.94	692.59	2.00	-89.93	6886.43	3500' Hold
21559.91	90.43	359.68	11053.80	10355.79	673.04	0.00	0.00	10377.64	TD at 21559.91

**Red Hills West 22-15 Fed Com #574H**  
SHL: 250' FSL & 1530' FWL  
PBHL: 100' FNL & 2260' FWL



**100' FSL Hard Line**  
**100' FNL Hard Line**  
**1650' FWL Hard Line**  
**2332' FWL Hard Line**

**DO NOT CROSS GREEN SECTION LINE**





Site: Red Hills West 22-15 Pad  
 Well: Red Hills West 22-15 Fed Com #573H  
 Wellbore: OH  
 Design: Plan #3  
 Lat: 32.021558  
 Long: -103.666557  
 GL: 3138.00  
 KB: KB=28 @ 3166.00usft (Patterson 595)



WELL DETAILS: Red Hills West 22-15 Fed Com #573H

+N-S	+E-W	Northing	Easting	Latitude	Longitude
0.00	0.00	372219.08	747983.97	32.021558	-103.666557

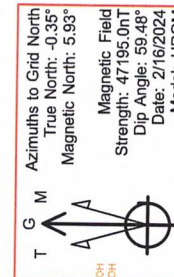
  

WELLBORE TARGET DETAILS (LAT/LONG)					
Name	RHW #573H - P2 - PBHL	TVD	+N-S	+E-W	Shape Point
		10916.00	10348.72	-186.77	747797.20

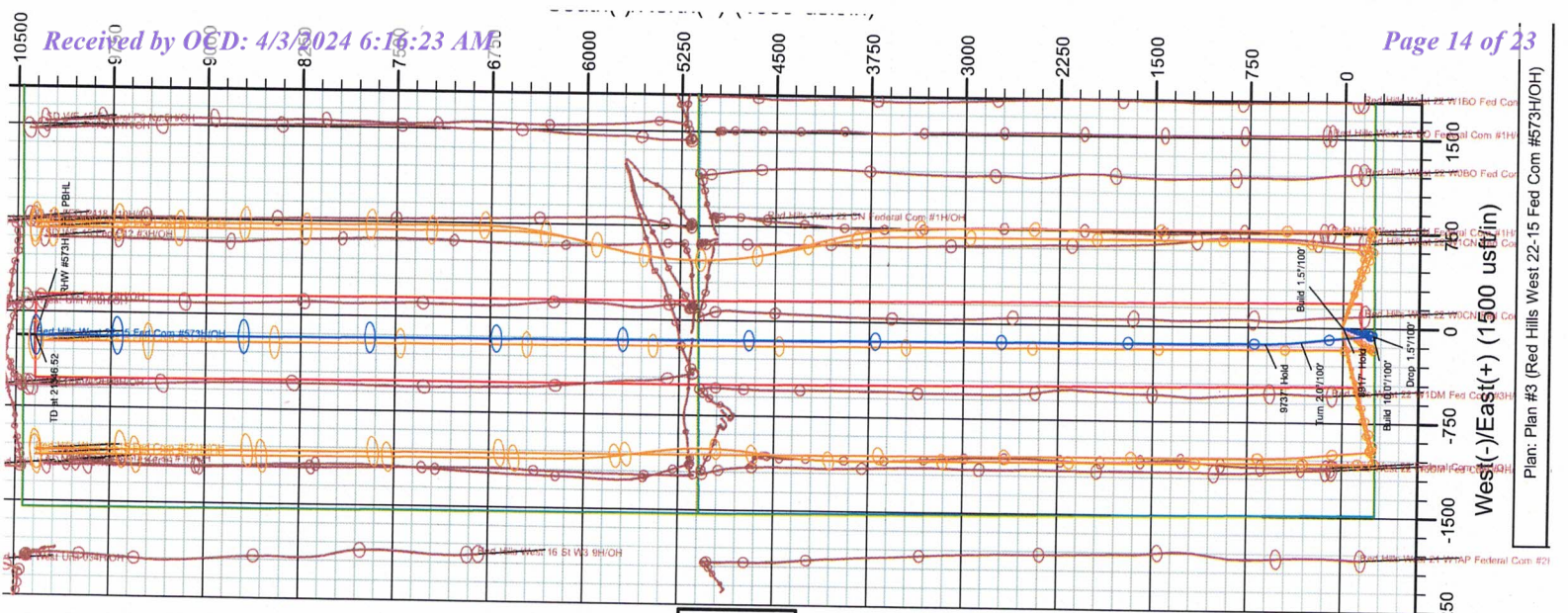
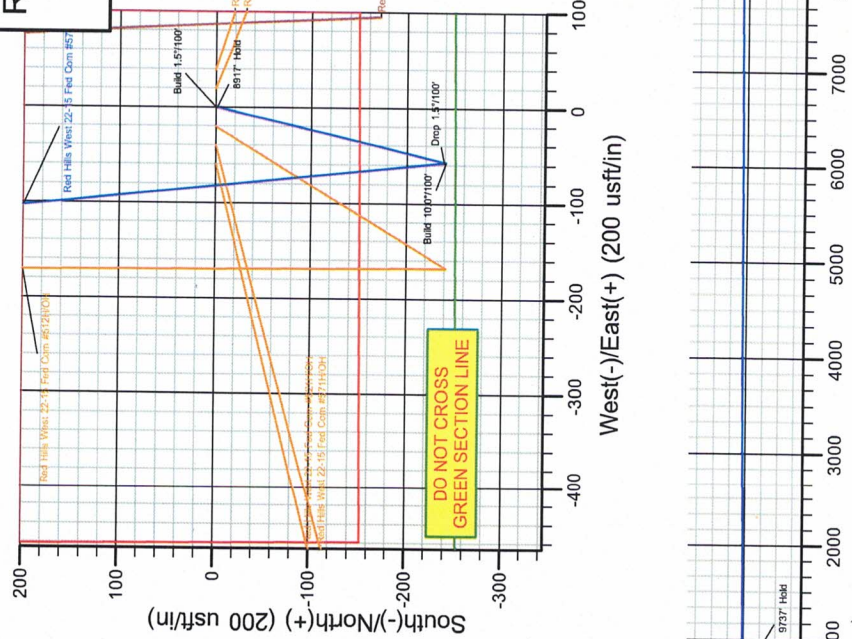
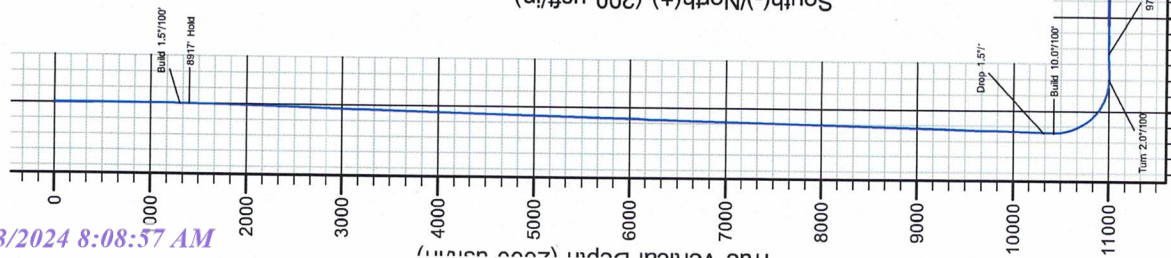
SECTION DETAILS

MD	Inc	Azi	TVD	+N-S	+E-W	Dleg	TFace	VSect	Annotation
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
1300.00	0.00	0.00	1300.00	0.00	0.00	0.00	0.00	0.00	Build 1.5°/100'
1404.84	1.57	193.53	1404.63	0.00	-0.34	1.50	193.53	0.00	8917' Hold
10321.79	1.57	193.53	10318.43	-238.88	-57.48	0.00	-237.80	0.00	Drop 1.5°/100'
10426.43	0.00	0.00	10423.06	-240.27	-57.82	1.50	180.00	0.00	Build 10.0°/100'
11331.03	90.46	354.10	10996.00	334.23	-117.19	10.00	354.10	336.28	Turn 2.0°/100'
11610.00	90.46	359.68	10993.76	612.67	-132.32	2.00	90.00	614.96	9737' Hold
21346.52	90.46	359.68	10916.00	10348.72	-186.77	0.00	0.00	10350.41	TD at 21346.52

Red Hills West 22-15 Fed Com #573H  
 SHL: 250' FSL & 1490' FWL  
 PBHL: 100' FNL & 1360' FWL



100' FSL Hard Line  
 100' FNL Hard Line  
 1030' FWL Hard Line  
 1690' FWL Hard Line



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

APPLICATION OF MEWBOURNE OIL COMPANY  
FOR COMPULSORY POOLING, LEA COUNTY,  
NEW MEXICO.

Case No. 24337

SELF-AFFIRMED STATEMENT OF NOTICE

COUNTY OF SANTA FE    )  
  ) ss.  
STATE OF NEW MEXICO )

James Bruce deposes and states:

1. I am over the age of 18, and have personal knowledge of the matters stated herein.
2. I am an attorney for Mewbourne Oil Company.
3. Mewbourne Oil Company has conducted a good faith, diligent effort to find the names and correct addresses of the interest owners entitled to receive notice of the application filed herein.
4. Notice of the application was provided to the interest owner, at its last known address, by certified mail. Copies of the notice letter and certified return receipt are attached hereto as Exhibit 4-A.
5. Applicant has complied with the notice provisions of Division Rules.

I understand that this Self-Affirmed Statement will be used as written testimony in this case. I affirm that my testimony in paragraphs 1 through 5 above is true and correct and is made under penalty of perjury under the laws of the State of New Mexico. My testimony is made as of the date handwritten next to my signature below.

Date: 4/2/24

James Bruce  
James Bruce

EXHIBIT 4

**JAMES BRUCE**  
ATTORNEY AT LAW

POST OFFICE BOX 1056  
SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213  
SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone)  
(505) 660-6612 (Cell)  
(505) 982-2151 (Fax)

[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

March 14, 2024

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

EXHIBIT

4-A

To: Persons on Exhibit A

Ladies and gentlemen:

Enclosed is a copy of an application, filed with the New Mexico Oil Conservation Division by Mewbourne Oil Company, requesting the following relief:

Case No. 24337: Mewbourne Oil Company seeks an order pooling all uncommitted mineral interest owners in the Bone Spring formation, limited to depths from the top of the First Bone Spring Sand to the base of the Bone Spring formation, underlying a proximity tract horizontal spacing unit comprised of the W/2 of Section 15 and the W/2 of Section 22, Township 26 South, Range 32 East, N.M.P.M., Lea County, New Mexico. Applicant proposes to drill the following wells to depths sufficient to test the Bone Spring formation:

(a) the Red Hills West 22/15 Fed Com. Well Nos. 521H, 571H, and 502H, with first take points in the SW/4SW/4 of Section 22 and last take points in the NW/4NW/4 of Section 15; and

(b) the Red Hills West 22/15 Fed Com. Well Nos. 524H, 574H and 573H, with first take points in the SE/4SW/4 of Section 22 and last take points in the NE/4NW/4 of Section 15.

Also to be considered will be the cost of drilling, completing, testing, and equipping 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 200% charge for the risk involved in drilling, completing, testing, and equipping the wells.

This matter is scheduled for hearing at 8:15 a.m. on Thursday, April 4, 2024. The hearing may be attended (a) in person in Pecos Hall of the Wendell Chino Building, 1<sup>st</sup> Floor, 1220 South St.



Francis Drive, Santa Fe New Mexico 87505, or (b) via the WebEx virtual meeting platform. To view the hearing docket and to determine how to participate in an electronic hearing, go to <https://www.emnrd.nm.gov/ocd/hearing-info/>, or contact Sheila Apodaca at [Sheila.Apodaca@emnrd.nm.gov](mailto:Sheila.Apodaca@emnrd.nm.gov). You are not required to attend this hearing, but as an owner of an interest who may be affected by the application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from contesting this matter at a later date. A party appearing in a Division case is required by Division Rules to file a Pre-Hearing Statement no later than five business days before the hearing date. This statement may be filed online with the Division at [ocd.hearings@emnrd.nm.gov](mailto:ocd.hearings@emnrd.nm.gov), and should include: The name of the party and his or her attorney; a concise statement of the case; the name(s) of the witness(es) the party will call to testify at the hearing; the approximate time the party will need to present his or her case; and identification of any procedural matters that need to be resolved prior to the hearing. The Pre-Hearing Statement must also be provided to the undersigned.

Very truly yours,



James Bruce

Attorney for Mewbourne Oil Company

EXHIBIT A

Chevron U.S.A. Inc.  
6301 Deauville Boulevard  
Midland, Texas 79706

Attention: Permitting Team

**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
*MOC Red Hills Wash*  
Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

OFFICIAL USE

<p>Certified Mail Fee \$ _____</p> <p>Extra Services &amp; Fees (check box, add fee as appropriate)</p> <p><input type="checkbox"/> Return Receipt (hardcopy) \$ _____</p> <p><input type="checkbox"/> Return Receipt (electronic) \$ _____</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery \$ _____</p> <p><input type="checkbox"/> Adult Signature Required \$ _____</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery \$ _____</p> <p>Postage \$ _____</p> <p>Total Postage and Fees \$ _____</p> <p>Sent To <b>Chevron U.S.A. Inc.</b> <b>6301 Deauville Boulevard</b> Street and Apt. No., or <b>Midland, Texas 79706</b> City, State, ZIP+4® _____</p>	<p>Postmark Here</p>
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PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7020 0090 0000 0864 5223

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY												
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul> <p>1. Article Addressed to:</p> <div style="border: 1px solid black; padding: 5px; margin: 10px auto; width: 80%;"> <p style="font-size: 0.8em;">Chevron U.S.A. Inc. 6301 Deauville Boulevard Midland, Texas 79706</p> </div> <div style="text-align: center; margin: 10px auto;"> <p style="font-size: 1.2em; font-weight: bold;">9590 9402 8721 3310 3774 28</p> </div> <p>2. Article Number (Transfer from service label)</p> <p style="font-size: 1.2em; font-weight: bold; text-align: center;">7020 0090 0000 0864 5223</p>	<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <b>Asland Nelson</b> C. Date of Delivery <b>3/19/24</b></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <table style="width: 100%; font-size: 0.8em;"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td></td> </tr> </table> <p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p> <p style="text-align: right; font-weight: bold; font-size: 1.2em;">MOC - R. Hills</p>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®												
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™												
<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery												
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™												
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery												
<input type="checkbox"/> Collect on Delivery Restricted Delivery													

**BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION**

**APPLICATION OF MEWBOURNE OIL COMPANY  
FOR COMPULSORY POOLING, LEA COUNTY,  
NEW MEXICO.**

Case No. 24337

**APPLICATION**

Mewbourne Oil Company applies for an order pooling all uncommitted mineral interest owners in the Bone Spring formation, limited to depths from the top of the First Bone Spring Sand to the base of the Bone Spring formation, underlying a proximity tract horizontal spacing unit comprised of the W/2 of Section 15 and the W/2 of Section 22, Township 26 South, Range 32 East, N.M.P.M., Lea County, New Mexico, and in support thereof, states:

1. Applicant is an interest owner in the W/2 of Section 15 and the W/2 of Section 22 (containing 640 acres), and has the right to drill a well or wells thereon.
2. Applicant proposes to drill the following wells to depths sufficient to test the Bone Spring formation:
  - (a) the Red Hills West 22/15 Fed Com. Well Nos. 521H, 571H, and 502H, with first take points in the SW/4SW/4 of Section 22 and last take points in the NW/4NW/4 of Section 15; and
  - (b) the Red Hills West 22/15 Fed Com. Well Nos. 524H, 574H and 573H, with first take points in the SE/4SW/4 of Section 22 and last take points in the NE/4NW/4 of Section 15
3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the W/2 of Section 15 and the W/2 of Section 22 for the purposes set forth herein.

EXHIBIT 5

4. Although applicant attempted to obtain voluntary agreements from all mineral interest owners to participate in the drilling of the wells or to otherwise commit their interests to the wells, certain interest owners have failed or refused to join in dedicating their interests. Therefore, applicant seeks an order pooling all uncommitted mineral interest owners in the Bone Spring formation, limited to depths from the top of the First Bone Spring Sand to the base of the Bone Spring formation, underlying the W/2 of Section 15 and the W/2 of Section 22, pursuant to NMSA 1978 §70-2-17.


5. The pooling of all uncommitted mineral interest owners in the Bone Spring formation, limited to depths from the top of the First Bone Spring Sand to the base of the Bone Spring formation, underlying the W/2 of Section 15 and the W/2 of Section 22 will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

**WHEREFORE**, applicant requests that, after notice and hearing. The Division enters its order:

- A. Pooling all uncommitted mineral interest owners in the Bone Spring formation, limited to depths from the top of the First Bone Spring Sand to the base of the Bone Spring formation, (Wildcat; Lower Bone Spring Pool/Pool Code 97903) underlying the W/2 of Section 15 and the W/2 of Section 22;
- B. Designating applicant as operator of the proposed wells;
- C. Considering the cost of drilling, completing, testing, and equipping the wells, and allocating the cost among the wells' working interest owners;
- D. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and

E. Setting a 200% charge for the risk involved in drilling, completing, testing, and equipping the wells in the event a working interest owner elects not to participate in the wells.

Respectfully submitted,

A handwritten signature in blue ink that reads "James Bruce". The signature is written in a cursive style and is positioned above a horizontal line.

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Mewbourne Oil Company

***Application of Mewbourne Oil Company for compulsory pooling, Lea County, New Mexico.***

Mewbourne Oil Company seeks an order pooling all uncommitted mineral interest owners in the Bone Spring formation, limited to depths from the top of the First Bone Spring Sand to the base of the Bone Spring formation, underlying a proximity tract horizontal spacing unit comprised of the W/2 of Section 15 and the W/2 of Section 22, Township 26 South, Range 32 East, N.M.P.M., Lea County, New Mexico. Applicant proposes to drill the following wells to depths sufficient to test the Bone Spring formation:

(a) the Red Hills West 22/15 Fed Com. Well Nos. 521H, 571H, and 502H, with first take points in the SW/4SW/4 of Section 22 and last take points in the NW/4NW/4 of Section 15; and

(b) the Red Hills West 22/15 Fed Com. Well Nos. 524H, 574H and 573H, with first take points in the SE/4SW/4 of Section 22 and last take points in the NE/4NW/4 of Section 15.

Also to be considered will be the cost of drilling, completing, testing, and equipping 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 200% charge for the risk involved in drilling, completing, testing and equipping the wells. The well unit is located approximately 36 miles south-southeast of Halfway, New Mexico.