

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

**APPLICATIONS OF MEWBOURNE
OIL COMPANY FOR COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO.**

CASE NOS. 24384 & 24385

APPLICANT'S CONSOLIDATED PRE-HEARING STATEMENT

Mewbourne Oil Company (OGRID No. 14744), the applicant in the above-referenced cases, submits this Consolidated 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.
Paula M. Vance, Esq.
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com

APPLICANT'S STATEMENT OF CASE

In these consolidated cases, Mewbourne seeks orders pooling all uncommitted interests in the Bone Spring formation underlying the NW4 of Section 3 and the N2 of Section 4, Township 18 South, Range 29 East, NMPM, Eddy County, New Mexico as follows:

- Under **Case 24384**, Mewbourne seeks to pool a standard 240--acre horizontal well spacing unit comprised of the N2NW4 of Section 3 and the N2N2 of Section 4 to be initially dedicated to the proposed **Samsonite 4/3 Fed Com 521H** well, to be horizontally drilled from a surface location in the E2NE4 of Section 5, with a first take point in the NW4W4 (Unit D) of Section 4 and a last take point in the NE4NW4 (Unit C) of Section 3; and
- Under **Case 24385**, Mewbourne seeks to pool a standard 240-acre horizontal well spacing unit comprised of the S2NW4 of Section 3 and the S2N2 of Section 4 to be initially dedicated to the proposed **Samsonite 4/3 Fed Com 523H** well, to be horizontally drilled from a surface location in the E2NE4 of Section 5, with a first take point in the SW4NW4 (Unit E) of Section 4 and a last take point in the SE4NW4 (Unit F) of Section 3.

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.

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Adriana Salgado, Landman	Self-affirmed Statement	Approx. 6
Charles Crosby, Geology	Self-affirmed Statement	Approx. 4

PROCEDURAL MATTERS

Mewbourne intends to present these consolidated cases by self-affirmed statements if they remain unopposed at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP



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
mfeldewert@hollandhart.com
agrarkin@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 336820

QUESTIONS

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 336820
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<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>