

**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.**

**CASE NO. \_\_\_\_\_**

**APPLICATION**

Mewbourne Oil Company (“Mewbourne” or “Applicant”) (OGRID No. 14744), through its undersigned attorneys, hereby files this application with the Oil Conservation Division pursuant to the provisions of NMSA 1978, § 70-2-17, for an order pooling all uncommitted mineral owners in the Wolfcamp formation [Purple Sage Wolfcamp Gas Pool (98220)] underlying a standard 621.13-acre, more or less, horizontal well spacing unit comprised of the S2 of Section 17 and Lots 9-12 and the SE4 of irregular Section 18, Township 22 South, Range 28 East, NMPM, Eddy County, New Mexico. In support of its application, Mewbourne 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 above-referenced horizontal spacing unit to the following proposed wells:

- **Old Indian Draw Unit Com 4H** well to be horizontally drilled from a surface location in the SE4 of Section 17, with a first take point in the SE4SE4 (Unit P) of Section 17 and a last take point in Lot 11 (SW4 SW4 equivalent) of irregular Section 18; and
- **Old Indian Draw Unit Com 9H** well to be horizontally drilled from a surface location in the SE4 of Section 17, with a first take point in the NE4SE4 (Unit I) of Section 17 and a last take point in Lot 10 (NE4 SW4 equivalent) of irregular Section 18.

3. Applicant has sought and been unable to obtain voluntary agreement for the development of these lands from all interest owners in the subject spacing unit.

4. The pooling of uncommitted mineral owners will allow Applicant to obtain a just and fair share of the oil and gas underlying the subject lands, avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.

WHEREFORE, Applicant requests that this application be set for hearing before an Examiner of the Oil Conservation Division on June 13, 2024, and, after notice and hearing as required by law, the Division enter an order:

- A. Pooling all uncommitted mineral owners in the horizontal spacing unit;
- B. Designating Applicant as operator of this spacing unit and the horizontal wells to be drilled thereon;
- C. Authorizing Applicant to recover its costs of drilling, completing, and equipping 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:  \_\_\_\_\_

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**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 all uncommitted mineral owners in the Wolfcamp formation underlying a standard 621.13-acre, more or less, horizontal well spacing unit comprised of the S2 of Section 17 and Lots 9-12 and the SE4 of irregular Section 18, Township 22 South, Range 28 East, NMPM, Eddy County, New Mexico. Said unit will be initially dedicated to the following proposed wells:

- **Old Indian Draw Unit Com 4H** well to be horizontally drilled from a surface location in the SE4 of Section 17, with a first take point in the SE4SE4 (Unit P) of Section 17 and a last take point in Lot 11 (SW4 SW4 equivalent) of irregular Section 18; and
- **Old Indian Draw Unit Com 9H** well to be horizontally drilled from a surface location in the SE4 of Section 17, with a first take point in the NE4SE4 (Unit I) of Section 17 and a last take point in Lot 10 (NE4 SW4 equivalent) of irregular Section 18.

Also, to be considered will be the cost of drilling and completing the wells and the allocation of the cost thereof, actual operating costs and charges for supervision, designation of Applicant as operator of the well, and a 200% charge for risk involved in drilling said wells. The subject area is located approximately 7 miles north of the Town of Loving, New Mexico.