

**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. 24505, 24506 & 24507

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

OTHER PARTIES

XTO Energy, Inc.

ATTORNEY

James P. Parrot
Miguel A. Suazo
Sophia A. Graham
Kaitlyn A. Luck
Beatty & Wozniak, P.C.
500 Don Gaspar Ave.
Santa Fe, NM 87505
(505) 946-2090
jparrot@bwenergylaw.com
msuazo@bwenergylaw.com
sgraham@bwenergylaw.com
kluck@bwenergylaw.com

APPLICANT'S STATEMENT OF CASE

In these consolidated cases, Mewbourne seeks orders pooling all uncommitted interests in the Bone Spring and Wolfcamp formations underlying 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, as follows:

- Under Case 24505, Mewbourne seeks to pool a standard 310.54-acre horizontal well spacing unit in the Bone Spring formation underlying the S2S2 of Section 17 and Lots 11-12 and the S2SE4 of irregular Section 18, to be initially dedicated to the proposed **Old Indian Draw Unit Com 6H** 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 (SW4SW4 equivalent) of irregular Section 18;
- Under Case 24506, Mewbourne seeks to pool a standard 310.50-acre horizontal well spacing unit in the Bone Spring formation underlying the N2S2 of Section 17 and Lots 9-10 and the N2SE4 of irregular Section 18, to be initially dedicated to the proposed **Old Indian Draw Unit Com 8H** 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 (NW4SW4 equivalent) of irregular Section 18; and
- Under Case 24507, Mewbourne seeks to pool a standard 621.13-acre horizontal well spacing unit in the Wolfcamp formation underlying the S2 of Section 17 and Lots 9-12 and the SE4 of irregular Section 18, to be initially dedicated to the following proposed wells:
 - **Old Indian Draw Unit Com 4H** 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 (SW4SW4 equivalent) of irregular Section 18; and

- o **Old Indian Draw Unit Com 9H** 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 (NE4SW4 equivalent) of irregular Section 18.

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
Thomas Sloan, Landman	Self-affirmed Statement	Approx. 4
Tyler Hill, Geologist	Self-affirmed Statement	Approx. 3

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

CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2024, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

James P. Parrot
Miguel A. Suazo
Sophia A. Graham
Kaitlyn A. Luck
Beatty & Wozniak, P.C.
500 Don Gaspar Ave.
Santa Fe, NM 87505
(505) 946-2090
jparrot@bwenergylaw.com
msuazo@bwenergylaw.com
sgraham@bwenergylaw.com
kluck@bwenergylaw.com

Attorneys for XTO Energy, Inc.



Michael H. Feldewert

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 351728

QUESTIONS

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 351728
	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>