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

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

CASE NOS. 24670 - 24671

# **CONSOLIDATED PRE-HEARING STATEMENT**

Mewbourne Oil Company ("Mewbourne" or "Applicant") submits its Consolidated Pre-

Hearing Statement pursuant to the rules of the Oil Conservation Division.

## APPLICANT

#### ATTORNEYS

Mewbourne Oil Company

Dana S. Hardy Jaclyn M. McLean Hinkle Shanor LLP P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com

#### **INTERESTED PARTY**

MRC Permian Company

#### ATTORNEY

Michael H. Feldewert Adam G. Rankin Paula M. Vance Post Office Box 2208 (505) 988-4421 mfeldewert@hollandhart.com agrankin@hollandhart.com pmvance@hollandhart.com

#### **STATEMENT OF THE CASES**

In **Case No. 24670**, Mewbourne applies for an order pooling all uncommitted interests in the Bone Spring formation underlying a 240-acre, more or less, standard horizonal spacing unit comprised of the W/2 W/2 of Section 16 and the W/2 NW/4 of Section 21, Township 19 South,

Range 33 East, Lea County, New Mexico. Mewbourne seeks to dedicate the Unit to the **Bushwood 21/16 Fed Com #521H** well, to be drilled from a surface hole location in the NW/4 SE/4 (Unit J) of Section 21 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 16.

In Case No. 24671, Mewbourne applies for an order pooling all uncommitted interests in the Bone Spring formation underlying a 240-acre, more or less, standard horizonal spacing unit comprised of the E/2 W/2 of Section 16 and the E/2 NW/4 of Section 21, Township 19 South, Range 33 East, Lea County, New Mexico. Mewbourne seeks to dedicate the Unit to the **Bushwood** 21/16 Fed Com #523H well, to be drilled from a surface hole location in the NW/4 SE/4 (Unit J) of Section 21 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 16.

The completed intervals of the wells will be orthodox. Also to be considered will be the cost of drilling and completing the wells and the allocation of the costs, the designation of Applicant as operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells.

The wells are located approximately 27 miles southwest of Lovington, New Mexico.

Witness	Occupation	<b>Estimated</b> Time	Exhibits
Ariana Rodrigues	Landman	Affidavit	Approx. 5
Cole Hatchel	Geologist	Affidavit	Approx. 3

#### PROPOSED EVIDENCE

#### PROCEDURAL MATTERS

Applicant intends to consolidate these cases for hearing and will present the cases by affidavit if there is no opposition to its applications.

Respectfully submitted,

HINKLE SHANOR LLP

/s/ Dana S. Hardy

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on July 18, 2024, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

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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 365366

QUESTIONS

Operator:	OGRID:
MEWBOURNE OIL CO	14744
P.O. Box 5270	Action Number:
Hobbs, NM 88241	365366
	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.	