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. 24894 24895

24896

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 Dylan M. Villescas Hinkle Shanor LLP P.O. Box 2068

Santa Fe, NM 87504-2068 Phone: (505) 982-4554 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com dvillescas@hinklelawfirm.com

INTERESTED PARTY

ATTORNEY

None at this time.

STATEMENT OF THE CASES

In Case No. 24894, 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 SW/4 of Section 9, Township 18 South, Range 35 East, Lea County, New Mexico. Mewbourne seeks to dedicate the unit to the **Top Round** 16/9 State Com #521H (B2ML) well, which will be drilled from a surface hole location in the

SE/4 SW/4 (Unit N) of Section 16 to a bottom hole location in the NW/4 SW/4 (Unit L) of Section 9.

In Case No. 24895, Mewbourne applies for an order pooling all uncommitted interests in the Bone Spring formation underlying a 480-acre, more or less, standard horizonal spacing unit comprised of the E/2 W/2 and W/2 E/2 of Section 16 and the E/2 SW/4 and W/2 SE/4 of Section 9, Township 18 South, Range 35 East, Lea County, New Mexico. Mewbourne seeks to dedicate the unit to the Top Round 16/9 State Com #525H (B2OJ) well, which will be drilled from a surface hole location in the SE/4 SW/4 (Unit N) of Section 16 to a bottom hole location in the NW/4 SE/4 (Unit J) of Section 9. The Top Round 16/19 State Com #525H (B2OJ) well will be located within 330' of the quarter-quarter section line separating the E/2 W/2 and W/2 E/2 of Sections 9 and 16 to allow for the creation of a 480-acre, standard horizontal spacing unit.

In Case No. 24896, 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 E/2 of Section 16 and the E/2 SE/4 of Section 9, Township 18 South, Range 35 East, Lea County, New Mexico. Mewbourne seeks to dedicate the unit to the **Top Round 16/9** State Com #528H (B2PI) well, which will be drilled from a surface hole location in the SE/4 SW/4 (Unit N) of Section 16 to a bottom hole location in the NE/4 SE/4 (Unit I) of Section 9.

The completed intervals of the wells are expected to 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 units and wells, and a 200% charge for the risk involved in drilling and completing the wells. The wells are located approximately 17 miles west of Hobbs, New Mexico.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Brad Dunn	Landman	Affidavit	Approx. 5
Charles Crosby	Geologist	Affidavit	Approx. 2

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

Dana S. Hardy Jaclyn M. McLean Dylan M. Villescas P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554 Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com dvillescas@hinklelawfirm.com

Counsel 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

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 397797

QUESTIONS

Operator:	OGRID:
MEWBOURNE OIL CO	14744
P.O. Box 5270	Action Number:
Hobbs, NM 88241	397797
	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.		