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

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

CASE NOS. 25109 & 25110

# APPLICANT'S CONSOLIDATED PRE-HEARING STATEMENT

Mewbourne Oil Company ("Mewbourne" or "Applicant") submits this consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

### **APPEARANCES**

APPLICANT ATTORNEY

Mewbourne Oil Company Michael H. Feldewert ("Mewbourne") Adam G. Rankin

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### APPLICANT'S STATEMENT OF THE CASE

Under Case No. 25109, Mewbourne seeks to pool the uncommitted interests in the Bone Spring formation (Pearl; Bone Spring; South [49865]) underlying a 1,572.79-acre, more or less, non-standard horizontal well spacing unit in the Bone Spring formation underlying Lots 3-4, E/2 SW/4, and SE/4 (S/2 equivalent) of irregular Section 7, Lots 1-4, E/2 W/2, and E/2 (entire Section equivalent) of irregular Sections 18 and 19, Township 19 South, Range 36 East, NMPM, Lea County, New Mexico. Applicant seeks to initially dedicate the above-referenced spacing unit to the proposed Black Pearl 7/19 Fed Com #526H, to be drilled horizontally from a surface location in NW/4 SE/4 (Unit J) of irregular Section 7, a first take point in NW/4 SE/4 (Unit J) of irregular

Section 7 and last take point the SW/4 SE/4 (Unit O) of irregular Section 19; and **Black Pearl 7/19 Fed Com #528H**, to be drilled horizontally from a surface location in NE/4 SE/4 (Unit I) of irregular Section 7, a first take point in NE/4 SE/4 (Unit I) of irregular Section 7 and last take point the SE/4 SE/4 (Unit P) of irregular Section 19.

Under Case No. 25110, Mewbourne seeks to pool the uncommitted interests in the Bone Spring formation (Pearl; Bone Spring; South [49865]) underlying a 1,574.79-acre, more or less, non-standard horizontal well spacing unit in the Bone Spring formation underlying Lots 1-4, E/2 W/2, and E/2 (entire Section equivalent) of irregular Section 31, Township 18 South, Range 36 East, and Lots 1-7, SE/4 NW/4, S/2 NE/4, E/2 SW/4, and SE/4 (entire Section equivalent) of irregular Section 6, and Lots 1-2, E/2 NW/4, and NE/4 (N/2 equivalent) of irregular Section 7, Township 19 South, Range 36 East, NMPM, Lea County, New Mexico. Applicant seeks to initially dedicate the above-referenced spacing unit to the proposed Flying Dutchman 7/31 State Com #526H, to be drilled horizontally from a surface location in SW/4 NE/4 (Unit G) of irregular Section 7, T19S-R36E, a first take point in SW/4 NE/4 (Unit G) of irregular Section 7, T19S-R36E and last take point the NW/4 NE/4 (Unit B) of irregular Section 31, T18S-R31E; and Flying Dutchman 7/31 State Com #528H, to be drilled horizontally from a surface location in SE/4 NE/4 (Unit H) of irregular Section 7, T19S-R36E, a first take point in SE/4 NE/4 (Unit H) of irregular Section 7, T19S-R36E and last take point the NE/4 NE/4 (Unit A) of irregular Section 31, T18S-R31E.

Applicant has filed a separate administrative application for approval of a non-standard spacing unit. The completed interval for the wells will comply with statewide setbacks for oil wells. Mewbourne has sought but been unable to obtain voluntary agreement for the development of these lands from all interest owners in the subject spacing units.

### APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS	
Peyton Warren, Landman	Self-Affirmed Statement	Approx. 5	
Charles Crosby, Geologist	Self-Affirmed Statement	Approx. 3	

# **PROCEDURAL MATTERS**

Mewbourne requests that these matters be consolidated for hearing and intends to present these cases by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

**HOLLAND & HART LLP** 

Bv:

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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

Action 416747

### QUESTIONS

Operator:	OGRID:
MEWBOURNE OIL CO	14744
P.O. Box 5270	Action Number:
Hobbs, NM 88241	416747
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

### QUESTIONS

Testimony			
Please assist us by provide the following information about your testimony.			
Number of witnesses	2		
Testimony time (in minutes)	5		