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

APPLICATION OF MEWBOURNE OIL COMPANY FOR APPROVAL OF AN OVERLAPPING HORIZONTAL WELL SPACING UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

**CASE NO. 25111** 

# APPLICANT'S PRE-HEARING STATEMENT

Mewbourne Oil Company ("Mewbourne" or "Applicant") submits this 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

Paula M. Vance Holland & Hart LLP Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

OTHER PARTIES

COG Operating LLC and Elizabeth Ryan
Concho Oil and Gas LLC Keri L. Hatley
ConocoPhillips

1040 D

1048 Paseo de Peralta

Santa Fe, New Mexico 87501

(505) 780-8000

beth.ryan@conocophillips.com keri.hatley@conocophillips.com

### **APPLICANT'S STATEMENT OF THE CASE**

Under Case No. 25111, Mewbourne seeks an order (a) approving a 640-acre, more or less, overlapping non-standard horizontal well spacing unit in the Bone Spring formation (Benson; Bone Spring [5200]) underlying the N/2 of Section 12, Township 19 South, Range 30 East, and Lots 1-2, E/2 NW/4, and NE/4 (N/2 equivalent) of irregular Section 7, Township 19 South, Range 31 East, NMPM, Eddy County, New Mexico and (b) pooling all uncommitted interests in this acreage. Applicant seeks to initially dedicate the above-referenced spacing unit to the proposed Zeke 12/7 Fed Com #611H, to be drilled horizontally from a surface location in NW/4 NW/4 (Unit D) of Section 12, T19S-R30E, a first take point in NW/4 NW/4 (Unit D) of Section 12, T19S-R30E and last take point the NE/4 NE/4 (Unit A) of irregular Section 7, T19S-R31E; and Zeke 12/7 Fed Com #613H, to be drilled horizontally from a surface location in NW/4 NW/4 (Unit D) of Section 12, T19S-R30E, a first take point in SW/4 NW/4 (Unit E) of Section 12, T19S-R30E and last take point the SE/4 NE/4 (Unit H) of irregular Section 7, T19S-R31E. This proposed horizontal well spacing unit will overlap the following existing spacing units in the Bone Spring formation:

- 160-acre spacing unit comprised of the W/2 W/2 of Section 12, T19S-R31E, dedicated to the Cresent Hale 12 Federal 1H (API: 30-015-39025) well currently operated by Cimarex Energy Co. of Colorado;
- 160-acre spacing unit comprised of the E/2 W/2 of Section 12, T19S-R31E, dedicated to the Cresent Hale 12 Federal 2H (API: 30-015-40054) well currently operated by Cimarex Energy Co. of Colorado;
- 160-acre spacing unit comprised of the W/2 E/2 of Section 12, T19S-R31E, dedicated to the Cresent Hale 12 Federal 3H (API: 30-015-40837) well currently operated by Cimarex Energy Co. of Colorado;
- 40-acre spacing unit comprised of Lot 1 of irregular Section 7, T19S-R31E, dedicated to the Strawberry 7 Federal 3 (API: 30-015-37171) well currently operated by Devon Energy Company LP;

- 40-acre spacing unit comprised of NW/4 NE/4 of irregular Section 7, T19S-R31E, dedicated to the Strawberry 7 Federal 2 (API: 30-015-32375) well currently operated by Devon Energy Company LP;
- 40-acre spacing unit comprised of NE/4 NE/4 of irregular Section 7, T19S-R31E, dedicated to the Strawberry 7 Federal 7 (API: 30-015-38485) well currently operated by Devon Energy Company LP;
- 160-acre spacing unit comprised of Lot 1, NE/4 NW/4, and N/2 NE/4 of irregular Section 7, T19S-R31E, dedicated to the Strawberry 7 Federal Com 11H (API: 30-015-42490) well currently operated by Devon Energy Company LP; and
- 160-acre spacing unit comprised of Lot 2, SE/4 NW/4, and S/2 NE/4 of irregular Section 7, T19S-R31E, dedicated to the Strawberry 7 Federal Com 5H (API: 30-015-37257) and Strawberry 7 Federal Com 8H (API: 30-015-41507) well currently operated by Devon Energy Company LP.

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. 6
Charles Crosby, Geologist	Self-Affirmed Statement	Approx. 3

### **PROCEDURAL MATTERS**

Mewbourne intends to present this case by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

**HOLLAND & HART LLP** 

By:

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, NM 87504
505-988-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com
pmvance@hollandhart.com

ATTORNEYS FOR MEWBOURNE OIL COMPANY

# **CERTIFICATE OF SERVICE**

I hereby certify that on January 2, 2025, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Elizabeth Ryan Keri L. Hatley ConocoPhillips 1048 Paseo de Peralta Santa Fe, New Mexico 87501 (505) 780-8000 beth.ryan@conocophillips.com keri.hatley@conocophillips.com

Attorneys for COG Operating LLC and Concho Oil and Gas LLC

Paula M. Vance

Sante Fe Main Office Phone: (505) 476-3441

General Information Phone: (505) 629-6116

Online Phone Directory https://www.emnrd.nm.gov/ocd/contact-us

# State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

QUESTIONS

Action 416749

### QUESTIONS

Operator:	OGRID:
MEWBOURNE OIL CO	14744
P.O. Box 5270	Action Number:
Hobbs, NM 88241	416749
	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	