

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

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

CASE NOS. 25055-25057, 25059

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

Mewbourne Oil Company
("Mewbourne")

ATTORNEY

Michael H. Feldewert
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

Avant Operating, LLC
("Avant") – Case Nos. 25055-25057 & 25059

Deana M. Bennett
Earl E. DeBrine, Jr.
Yarithza Peña
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800

ConocoPhillips
("Conoco") – Case No. 25059

Elizabeth A. Ryan
Keri L. Hatley
ConocoPhillips
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000

APPLICANT'S STATEMENT OF THE CASE

Under these consolidated cases, Mewbourne seeks orders pooling the Bone Spring formation (Corbin, Bone Spring South [13160]) for the referenced acreage, all in Township 18 South, Range 33 East, NMPM, Lea County, New Mexico, as follows:

- Under **Case No. 25055**, Mewbourne seeks to pool the uncommitted interests underlying a standard 339.24-acre, more or less, horizontal well spacing unit comprised of Lots 1-4 (W2W2 equivalent) of irregular Sections 30 and 19, and initially dedicate the unit to the proposed **Mysterio 30/19 Fed 521H** well, to be horizontally drilled from a surface location in the SE4SW4 (Unit N) of irregular Section 18, with a first take point in Lot 1 (NW4NW4 equivalent) (Unit D) of irregular Section 19 and a last take point in Lot 4 (SW4SW4 equivalent) (Unit M) of irregular Section 30;
- Under **Case No. 25056**, Mewbourne seeks to pool the uncommitted interests underlying a standard 320-acre, more or less, horizontal well spacing unit comprised of the E2W2 of irregular Sections 30 and 19, and initially dedicate the unit to the proposed **Mysterio 30/19 Fed 523H** well, to be horizontally drilled from a surface location in the SE4SW4 (Unit N) of irregular Section 18, with a first take point in the NE4NW4 (Unit C) of irregular Section 19 and a last take point in the SE4SW4 (Unit N) of irregular Section 30;
- Under **Case No. 25057**, Mewbourne seeks to pool the uncommitted interests underlying a standard 320-acre, more or less, horizontal well spacing unit comprised of the W2E2 of irregular Sections 30 and 19, and initially dedicate the unit to the proposed **Mysterio 30/19 Fed 525H** well, to be horizontally drilled from a surface location in the SW4SE4 (Unit O) of irregular Section 18, with a first take point in the

NW4NE4 (Unit B) of irregular Section 19 and a last take point in the SW4SE4 (Unit O) of irregular Section 30; and

- Under **Case No. 25059**, Mewbourne seeks to pool the uncommitted interests underlying a standard 320-acre, more or less, horizontal well spacing unit comprised of the E2E2 of irregular Sections 30 and 19, and dedicate the unit to the proposed **Mysterio 30/19 Fed Com 527H** well, to be horizontally drilled from a surface location in the SW4SE4 (Unit O) of irregular Section 18, with a first take point in the NE4NE4 (Unit A) of irregular Section 19 and a last take point in the SE4SE4 (Unit P) of irregular Section 30.

Due to concerns regarding the Dune Sagebrush Lizard, Mewbourne was advised by the Bureau of Land Management that it would be required to change the surface hole and bottom hole locations for the proposed wells. This change is not a material impact to the proposed horizontal spacing units.

The completed interval for each well 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
Brock Dixon, 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

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
agrarkin@hollandhart.com
pmvance@hollandhart.com

ATTORNEYS FOR MEWBOURNE OIL COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2025, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Deana M. Bennett
Earl E. DeBrine, Jr.
Yarithza Peña
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800
deana.bennett@modrall.com
earl.debrine@modrall.com
Yarithza.Pena@modrall.com
Attorneys for Avant Operating, LLC

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 ConocoPhillips



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 429064

QUESTIONS

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 429064
	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.