

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

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

CASE NOS. 25141-25144

MEWBOURNE’S CONSOLIDATED PRE-HEARING STATEMENT

Mewbourne Oil Company (“Mewbourne” or “Applicant”), the applicant in the above-referenced cases, 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

APPLICANT’S STATEMENT OF CASE

Under these consolidated cases, Mewbourne seeks orders pooling the Bone Spring formation San Lorenzo; Bone Spring [53600] for the referenced acreage, all in Township 25 South, Range 28 East, NMPM, Eddy County, New Mexico, as follows:

- Under **Case No. 25141**, Mewbourne seeks an order (1) approving a 320.62-acre, more or less, overlapping horizontal well spacing unit underlying Lot 4, SE/4 NW/4, and W/2 SW/4 (W/2 W/2 equivalent) of irregular Section 4, and W/2 W/2

of Section 9, and (2) pooling all uncommitted interests in this acreage. Mewbourne seeks to initially dedicate the unit to the proposed **San Lorenzo 9-4 State Com #551H** well to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 9 to a bottom hole location in Lot 4 (NW/4 NW/4 equivalent) of irregular Section 4. This proposed horizontal well spacing unit will overlap the following existing spacing units in the Bone Spring formation:

- 160-acre spacing unit comprised of Lot 4, SW/4 NW/4, and W/2 SW/4 (W/2 W/2 equivalent) of irregular Section 4, T25S-R28E, dedicated to the Odie 4 State 1H (API: 30-015-41311) well currently operated by RAYBAW Operating, LLC; and
 - 160-acre spacing unit comprised of the W/2 W/2 of Section 9, T25S-R28E, dedicated to the San Lorenzo 9 MD Fee 1H (API: 30-015-41305) well currently operated by Mewbourne Oil Company.
- Under **Case No. 25142**, Mewbourne seeks and order (1) approving a 320.50-acre, more or less, overlapping horizontal well spacing unit underlying Lot 3, SW/4 NW/4, and E/2 SW/4 (E/2 W/2 equivalent) of irregular Section 4, and E/2 W/2 of Section 9, and (2) pooling all uncommitted interests in this acreage. Mewbourne seeks to initially dedicate the unit to the proposed **San Lorenzo 9-4 State Com #553H** well to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 9 to a bottom hole location in Lot 3 (NE/4 NW/4 equivalent) of irregular Section 4. This proposed horizontal well spacing unit will overlap the following existing spacing units in the Bone Spring formation:
 - 160-acre spacing unit comprised of Lot 3, SE/4 NW/4, and E/2 SW/4 (E/2 W/2 equivalent) of irregular Section 4, T25S-R28E, dedicated to the Nermal 4 State 1H (API: 30-015-41239) well currently operated by RAYBAW Operating, LLC; and
 - 160-acre spacing unit comprised of the E/2 W/2 of Section 9, T25S-R28E, dedicated to the San Lorenzo 9 NC Fee 1H (API: 30-015-40749) well

currently operated by Mewbourne Oil Company.

- Under **Case No. 25143**, Mewbourne seeks and order (1) approving a 320.38-acre, more or less, overlapping horizontal well spacing unit underlying Lot 2, SW/4 NE/4, and W/2 SE/4 (W/2 E/2 equivalent) of irregular Section 4, and W/2 E/2 of Section 9, and (2) pooling all uncommitted interests in this acreage. Mewbourne seeks to initially dedicate the unit to the proposed **San Lorenzo 9-4 State Com #556H** well to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 9 to a bottom hole location in Lot 2 (NW/4 NE/4 equivalent) of irregular Section 4. This proposed horizontal well spacing unit will overlap the following existing spacing unit in the Bone Spring formation:
 - 160-acre spacing unit comprised of Lot 2, SW/4 NE/4, and W/2 SE/4 (W/2 E/2 equivalent) of irregular Section 4, T25S-R28E, dedicated to the Kayro 4 State 1H (API: 30-015-41292) well currently operated by RAYBAW Operating, LLC.
- Under **Case No. 25144**, Mewbourne seeks (1) approving a 320.26-acre, more or less, overlapping horizontal well spacing unit underlying Lot 1, SE/4 NE/4, and E/2 SE/4 (E/2 E/2 equivalent) of irregular Section 4, and E/2 E/2 of Section 9, and (2) pooling all uncommitted interests in this acreage. Mewbourne seeks to initially dedicate the unit to the proposed **San Lorenzo 9-4 State Com #558H** well to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 9 to a bottom hole location in Lot 1 (NE/4 NE/4 equivalent) of irregular Section 4. This proposed horizontal well spacing unit will overlap the following existing spacing unit in the Bone Spring formation:
 - 160-acre spacing unit comprised of Lot 1, SE/4 NE/4, and E/2 SE/4 (E/2 E/2 equivalent) of irregular Section 4, T25S-R28E, dedicated to the Pooky 4 State 1H (API: 30-015-41241) well currently operated by RAYBAW

Operating, LLC.

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 mineral interest owners in the subject acreage.

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Carson Cullen, Landman	Self-Affirmed Statement	Approx. 5
Cole Hatchel, 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



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

ATTORNEYS FOR MEWBOURNE OIL COMPANY

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 429572

QUESTIONS

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 429572
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>