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

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

CASE NO.	
----------	--

APPLICATION

Pursuant to NMSA 1978, § 70-2-17, Mewbourne Oil Company ("Mewbourne" or "Applicant") (OGRID No. 14744) files this application with the Oil Conservation Division ("Division") seeking an order pooling all uncommitted mineral interests in the Bone Spring formation underlying a 1,281.32-acre, more or less, non-standard horizontal spacing unit comprised of Sections 31 and 32, Township 21 South, Range 26 East, Eddy County, New Mexico ("Unit"). In support of this application, Mewbourne states the following.

- 1. Applicant is a working interest owner in the Unit and has the right to drill wells thereon.
 - 2. Applicant seeks to dedicate the Unit to the following wells ("Wells"):
 - a. **G W Buffalo 32/31 Fed Com #521H**, which will be drilled from a surface hole location in the NE/4 SE/4 (Unit I) of Section 32 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 31;
 - b. **G W Buffalo 32/31 Fed Com #523H**, which will be drilled from a surface hole location in the NE/4 SE/4 (Unit I) of Section 32 to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 31;
 - c. **G W Buffalo 32/31 Fed Com #525H**, which will be drilled from a surface hole location in the NE/4 SE/4 (Unit I) of Section 32 to a bottom hole location in the NW/4 SW/4 (Unit L) of Section 31; and

- d. **G W Buffalo 32/31 Fed Com #527H**, which will be drilled from a surface hole location in the NE/4 SE/4 (Unit I) of Section 32 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 31.
- 3. The completed intervals of the Wells will be orthodox.
- 4. Applicant has undertaken diligent, good-faith efforts to obtain voluntary agreements from all interest owners to participate in the drilling of the Wells but has been unable to obtain voluntary agreements from all interest owners.
- 5. The pooling of uncommitted interests will avoid the drilling of unnecessary wells, prevent waste, and protect correlative rights.
- 6. Mewbourne has requested administrative approval of a non-standard horizontal spacing unit.
- 7. In order to allow Applicant to obtain its just and fair share of the oil and gas underlying the subject lands, all uncommitted interests in the Unit should be pooled and Applicant should be designated the operator of the proposed horizontal Wells and the Unit.

WHEREFORE, Applicant requests that this application be set for hearing before an Examiner of the Oil Conservation Division on March 13, 2025, and, after notice and hearing as required by law, the Division enter an order:

- A. Pooling all uncommitted interests in the Unit;
- B. Approving the initial Wells in the Unit;
- C. Designating Applicant as the operator of the Unit and the horizontal Wells to be drilled thereon;
- D. Authorizing Applicant to recover its costs of drilling, equipping, and completing the Wells;

- E. Approving the actual operating charges and costs of supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and
- F. Imposing a 200% charge for the risk assumed by Applicant in drilling and completing the Wells against any working interest owner who does not voluntarily participate in the drilling of the Wells.

Respectfully submitted,

HINKLE SHANOR LLP

<u>/s/ Dana S. Hardy</u>

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

Santa Fe, NM 87504-2068

Phone: (505) 982-4554 Facsimile: (505) 98208623 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com

Counsel for Mewbourne Oil Company