

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

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

**CASE NOS. 25515-25516**

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

**CASE NOS. 25517-25518**

**MEWBOURNE’S AMENDED CONSOLIDATED PRE-HEARING STATEMENT**

Mewbourne Oil Company (“Mewbourne” or “Applicant”), the applicant in the above-referenced matters, submits this amended consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Mewbourne Oil Company  
 (“Mewbourne”)

**ATTORNEY**

Adam G. Rankin  
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Holland & Hart LLP  
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**APPLICANT’S STATEMENT OF THE CASE**

In these consolidated cases, Mewbourne seeks orders pooling for the referenced acreage, all in Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico, as follows:

- Under **Case No. 25515**, Mewbourne seeks an order pooling all uncommitted interest owners in the Bone Spring formation (Malaga; Bone Spring [42780]) in a standard 320-acre, more or less, well spacing unit underlying the W/2 E/2 of Sections 16 and 21, and to initially dedicate the above-referenced spacing unit to the proposed **Creedence 21/16 Fed Com 556H** well (API no. 30-15-55805), to be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 28, a first take point in the SW/4 SE/4 (Unit O) of Section 21, and to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 16.
- Under **Case No. 25516**, Mewbourne seeks an order pooling all uncommitted interest owners in the Bone Spring formation (Malaga; Bone Spring [42780]) in a standard 320-acre, more or less, well spacing unit underlying the E/2 E/2 of Sections 16 and 21, and to initially dedicate the above-referenced spacing unit to the proposed **Creedence 21/16 Fed Com 558H** well (API no. 30-15-55811), to be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 28, a first take point in the SE/4 SE/4 (Unit P) of Section 21, and to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 16.
- Under **Case No. 25517**, Mewbourne seeks an order (1) approving a standard 320-acre, more or less, overlapping horizontal well spacing unit in the Bone Spring formation (Willow Lake; Bone Spring [64450]) underlying the W/2 E/2 of Sections 28 and 33, and (2) pooling all uncommitted interests in this acreage. Mewbourne seeks to initially dedicate the above-referenced spacing unit to the proposed **Kansas 28/33 Fed Com 556H** well (API no. 30-15-55804), to be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 28, a first take point in the NW/4

NE/4 (Unit B) of Section 28, and to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 33. The proposed horizontal well spacing unit will overlap the following existing spacing unit in the Bone Spring formation:

- A 160-acre horizontal well spacing unit comprised of the W/2 E/2 of Section 33, T24S-R28E, operated by COG Operating LLC and dedicated to the Really Scary Federal 4H (30-015-41670).
- Under **Case No. 25518**, Mewbourne seeks an order (1) approving a standard 320-acre, more or less, overlapping horizontal well spacing unit in the Bone Spring formation (Willow Lake; Bone Spring [64450]) underlying the E/2 E/2 of Sections 28 and 33, and (2) pooling all uncommitted interests in this acreage. Mewbourne seeks to initially dedicate the above-referenced spacing unit to the proposed **Kansas 28/33 Fed Com 558H** well (API no. 30-15-55697), to be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 28, a first take point in the NE/4 NE/4 (Unit A) of Section 28, and to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 33. The proposed horizontal well spacing unit will overlap the following existing spacing unit in the Bone Spring formation:

- A 160-acre horizontal well spacing unit comprised of the E/2 E/2 of Section 33, T24S-R28E, operated by COG Operating LLC and dedicated to the Really Scary Federal 5H (30-015-40241).

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**

| <b>WITNESS<br/>Name and Expertise</b> | <b>ESTIMATED TIME</b>   | <b>EXHIBITS</b> |
|---------------------------------------|-------------------------|-----------------|
| Tyler Jolly, Landman                  | Self-Affirmed Statement | Approx. 4       |

Tyler Hill, 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: 

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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 514572

**QUESTIONS**

|   |  |
|---|--|
| Operator:<br>MEWBOURNE OIL CO<br>P.O. Box 5270<br>Hobbs, NM 88241 | OGRID:<br>14744  |
|   | Action Number:<br>514572                                 |
|   | Action Type:<br>[HEAR] Prehearing Statement (PREHEARING) |

**QUESTIONS**

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|--|---|
| <b>Testimony</b>   |   |
| <i>Please assist us by provide the following information about your testimony.</i> |   |
| Number of witnesses  | 2 |
| Testimony time (in minutes)  | 5 |