

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

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

**APPLICATION OF MEWBOURNE OIL COMPANY
FOR APPROVAL OF EXPANSION OF A UNIT AREA,
LEA COUNTY, NEW MEXICO.**

Case No. 21418

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Mewbourne Oil Company ("Mewbourne") as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Mewbourne Oil Company
Suite 1020
500 West Texas
Midland, Texas 79701

Attention: Adriana Salgado
(432) 682-3715

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

OPPONENTS

COG Operating LLC
Chisholm Energy Operating LLC
Devon Energy Operating, L.P.

Marathon Oil Permian LLC
Apache Corporation

OPPONENTS' ATTORNEYS

Holland & Hart LLP

Modrall Sperling

STATEMENT OF THE CASE

APPLICANT

Mewbourne seeks an order approving expansion of the North Wilson Deep Unit. The expanded unit area will cover 12,142.39 acres of State of New Mexico lands in Lea County described as follows:

Township 20 South, Range 36 East, NMPPM

Section 31: Lots 1-4, E/2W/2, and E/2 (All)
Section 32: SW/4

Township 21 South, Range 35 East, NMPPM

Section 4: Lots 1-16 and S/2 (All)
Section 5: Lots 1-16 and S/2 (All)
Section 6: Lots 1, 2, 7-10, 15, 16, and SE/4 (E/2)
Section 7: E/2
Section 8: All
Section 9: All
Section 16: All
Section 17: All
Sections 20-22: All
Section 27: All
Section 28: All
Section 29: N/2
Section 33: All
Section 34: All

Township 22 South, Range 35 East, NMPPM

Section 3: Lots 1-4, S/2N/2, and S/2 (All)
Section 10: W/2
Section 15: W/2

The unitized zone is the Bone Spring formation.

Please note the following:

1. The proposed unit area was originally slightly larger in size, but Mewbourne eliminated the E/2 §18-21S-35E and §4-22S-35E at the request of Chisholm Energy. It also eliminated the SE/4 §32-20S-36E at the request of COG Operating.
2. The proposed unit area originally covered the Bone Spring and Wolfcamp formations. It now includes only the Bone Spring formation.

This is an exploratory unit, and thus joinder in the unit is completely voluntary.

OPPONENTS

PROPOSED EVIDENCE

APPLICANT

WITNESSES

Adriana Salgado
(landman)

EST. TIME

20 min.

EXHIBITS

Approx. 6

Jordan Carrell
(geologist)

15 min.

Approx. 12

OPPONENTS

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

Respectfully submitted,



James Bruce
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Attorney for Mewbourne Oil Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 14th day of January, 2021 via e-mail:

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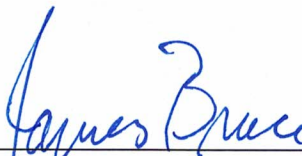
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