

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

**APPLICATION OF MEWBOURNE OIL  
COMPANY TO AMEND ORDER NO. R-21428,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 21753  
ORDER NO. R-21428**

**PRE-HEARING STATEMENT**

Mewbourne Oil Company (“Applicant”) submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Mewbourne Oil Company

**ATTORNEYS**

Dana S. Hardy  
Michael Rodriguez  
P.O. Box 2068  
Santa Fe, NM 87504-2068  
Phone: (505) 982-4554  
Facsimile: (505) 982-8623  
dhardy@hinklelawfirm.com  
mrodriguez@hinklelawfirm.com

**INTERESTED PARTIES**

None.

**ATTORNEYS**

**STATEMENT OF THE CASE**

Oil Conservation Division Order No. R-21428, entered on August 18, 2020 in Case No. 21358: approved a 480-acre, more or less, standard horizontal spacing unit comprised of the N/2 of Section 15 and the NW/4 of Section 14, Township 20 South, Range 29 East in Eddy County, New Mexico (“the Unit”); designated Mewbourne as the operator of the Unit; pooled the uncommitted interests in the Wolfcamp formation (Burton Flat, Upper Wolfcamp Pool, Code

98315); and dedicated the Unit to the Ithaca 15/14 W0EF Fed Com #1H well, which was to be horizontally drilled from a surface location 1360' FNL and 205' FWL (Unit E) in Section 15 to a bottom hole location 1360' FNL and 2540' FWL (Unit F) in Section 14. The order required Mewbourne to commence drilling the well within one year from the date of the order.

Mewbourne seeks to: amend the horizontal spacing unit for the proposed Ithaca 15/14 W0EF Fed Com #1H well to consist of a 240-acre, more or less, standard horizontal spacing unit that includes the S/2 N/2 of Section 15 and the S/2 NW/4 of Section 14; amend the location of the proposed Ithaca 15/14 W0EF Fed Com #1H well so that the well will be horizontally drilled from a surface location approximately 1360' FNL and 205' FWL (Unit E) in Section 15 to a bottom hole location approximately 2100' FNL and 2540' FWL (Unit F) in Section 14; and seeks an extension of the deadline to commence drilling the well until one year after the date of the new order. The proposed well is located approximately 10 miles northeast of Carlsbad, New Mexico.

**PROPOSED EVIDENCE**

<b>Witness</b>	<b>Occupation</b>	<b>Estimated Time</b>	<b>Exhibits</b>
Tyler Jolly	Landman	Affidavit	Approx. 8
Charles Crosby	Geologist	Affidavit	Approx. 4

**PROCEDURAL MATTERS**

Applicant will present its case by affidavit if there is no opposition to its application.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

Dana S. Hardy

Michael Rodriguez

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623

dhardy@hinklelawfirm.com

mrodriguez@hinklelawfirm.com

*Counsel for Mewbourne Oil Company*