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. 22869 & 22870

APPLICANT'S CONSOLIDATED PRE-HEARING STATEMENT

Mewbourne Oil Company (OGRID No. 14744), the applicant in the above-referenced cases, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT ATTORNEY

Mewbourne Oil Company Michael H. Feldewert, Esq.

Adam G. Rankin, Esq. Julia Broggi, Esq. Paula M. Vance, Esq. Holland & Hart LLP Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

OTHER PARTIES ATTORNEY

Coterra Energy Co, Inc., and subsidiaries Cimarex Energy, Co., Cimarex Energy Co. of Colorado, and Magnum Hunter Production, Inc. Darin C. Savage Andrew D. Schill William E. Zimsky Luke Kittinger

ABADIE & SCHILL, PC 214 McKenzie Street

Santa Fe, New Mexico 87501

(970) 385-4401

(970) 385-4901 Facsimile

COG Operating LLC

Ocean Munds-Dry Elizabeth Ryan Joby Rittenhouse ConocoPhillips 1048 Paseo de Peralta Santa Fe, New Mexico 87501 (505) 780-8000

APPLICANT'S STATEMENT OF CASE

In these consolidated cases, Mewbourne seeks orders pooling all uncommitted interests in the Bone Spring formation [Winchester Bone Spring Pool (65010)] underlying the N2 equivalent of irregular Sections 5 and 6, Township 20 South, Range 29 East, NMPM, Eddy County, New Mexico as follows:

- Under Case 22869, Mewbourne seeks to pool a standard 309.88-acre horizontal well spacing unit comprised of the Lot 5 (SW4NW4 equivalent), SE4NW4, S2NE4 of irregular Section 6 and S2N2 of irregular Section 5 to be initially dedicated to the proposed Sig 6/5 B2EH Fed Com #1H well to be horizontally drilled from a surface location in NE4NE4 (Lot 1) of Section 1, Township 20 South, Range 28 East, to a bottom hole location in SE4NE4 (Unit H) of Section 5, Township 20 South, Range 29 East.
- Under Case 22870, Mewbourne seeks to pool a standard 332.68-acre horizontal well spacing unit comprised of Lots 1-4 (N2N2 equivalent) of irregular Section 6 and Lots 1-4 (N2N2 equivalent) of irregular Section 5 to be initially dedicated to the proposed Sig 6/5 B2DA Fed Com #1H well to be horizontally drilled from a surface location in Lot 1 (NE4NE4 equivalent) of irregular Section 1, Township 20 South, Range 28 East, to a bottom hole location in Lot 1 (NE4NE4 equivalent) of Section 5, Township 20 South, Range 29 East.

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 Tyler Jolly, Landman	ESTIMATED TIME Affidavit	Approx. 6

PROCEDURAL MATTERS

Mewbourne intends to present these consolidated cases by affidavit if they are unopposed at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

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

pmvance@hollandhart.com

ATTORNEYS FOR MEWBOURNE OIL COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2022, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Darin C. Savage
Andrew D. Schill
William E. Zimsky
Luke Kittinger
ABADIE & SCHILL, PC
214 McKenzie Street
Santa Fe, New Mexico 87501
(970) 385-4401
(970) 385-4901 FAX
darin@abadieschill.com
andrew@abadieschill.com
bill@abadieschill.com
luke@abadieschill.com

Attorneys for Coterra Energy Co, Inc., and subsidiaries Cimarex Energy, Co., Cimarex Energy Co. of Colorado, and Magnum Hunter Production, Inc.

Ocean Munds-Dry
Elizabeth Ryan
Joby Rittenhouse
ConocoPhillips
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000
Ocean.Munds-Dry@conocophillips.com
Beth.Ryan@concophillips.com
Joby.Rittenhouse@conocophillips.com

Attorneys for COG Operating LLC

Michael H. Feldewert