

**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. 22007

**PRE-HEARING STATEMENT
AND
NOTICE OF CHANGE OF COUNSEL**

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

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

APPLICANT'S ATTORNEY

James Bruce
See Procedural Matters below

Attention: Tyler Jolly
(432) 682-3715

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Mewbourne Oil Company seeks an order pooling all mineral interest owners in the Wolfcamp formation underlying a horizontal spacing unit comprised of the S/2 of Section 22 and the /2 of Section 21, Township 22 South, Range 27 East, NMPM. The unit will be dedicated to (a) the Papa Grande 22/21 W0AD Fee Well No. 1H, with a first take point in the NE/4NE/4 of 22 and a last take point in the NW/4NW/4 of Section 21, and (b) the Papa Grande 22/21 W0HE Fee Well No. 1H, with a first take point in the SE/4NE/4 of 22 and a last take point in the SW/4NW/4 of Section 21. Also to be considered will be the cost of drilling, completing, and equipping the wells and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the wells, and a 200% charge for the risk involved in drilling, completing, and equipping the wells.

OPPONENT

PROPOSED EVIDENCEAPPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBIT</u>
Tyler Jolly (landman)	10 min.	Approx. 6
Tyler Hill (geologist)	10 min.	Approx. 6

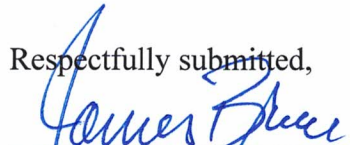
OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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PROCEDURAL MATTERS

1. Applicant will present this case by affidavit if it is unopposed.
2. Due to a potential conflict of interest, the undersigned withdraws as attorney for applicant, and will be replaced by Holland & Hart LLP.

Respectfully submitted,



James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

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 24th day of June, 2021 by e-mail:

Michael Feldewert
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Kaitlyn Luck
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James Bruce

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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 33518

QUESTIONS

Operator: MEWBOURNE OIL COMPANY 3901 S Broadway Avenue Tyler, TX 75701	OGRID: 275813
	Action Number: 33518
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witness	Not answered.
Testimony time (in minutes)	Not answered.