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

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

CASE NOS. 22953-22954

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

APPLICANT'S STATEMENT OF CASE

In these consolidated cases, Mewbourne seeks orders pooling all uncommitted interests in the Bone Spring formation [Mescalero Escarpe; Bone Spring (45793)] underlying the E/2 of Sections 15 and 10, Township 18 South, Range 33 East, NMPM, Lea County, New Mexico as follows:

- Under Case 22953, Mewbourne seeks to pool a standard 320-acre, more or less, horizontal spacing unit comprised of W/2 E/2 of Sections 15 and 10, Township 18
 South, Range 33 East, to be initially dedicated to the proposed Bravos 15/10 B2OB
 Fed Com 1H well to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 15 to a bottom hole location in NW/4 NE/4 (Unit B) of Section 10.
- Under Case 22954, Mewbourne seeks to pool a standard 320-acre, more or less, horizontal spacing unit comprised of E/2 E/2 of Sections 15 and 10, Township 18
 South, Range 33 East, to be initially dedicated to the proposed Bravos 15/10 B2PA
 Fed Com 1H well to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 15 to a bottom hole location in NE4NE4 (Unit A) of Section 10.

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

Affidavit

Approx. 6

Jordan Carrell, Geology

Affidavit

Approx. 3

PROCEDURAL MATTERS

Mewbourne intends to present these consolidated cases by affidavit if they remain 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

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720 District II

811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720 District III

1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

QUESTIONS

Action 129547

QUESTIONS

Operator:	OGRID:
MEWBOURNE OIL CO	14744
	Action Number:
Hobbs, NM 88241	129547
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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