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. 23171-23172

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 Wolfcamp formation [Gatuna Canyon; Wolfcamp Pool (27191)] underlying the S/2 equivalent of irregular Sections 5 and 6, Township 20 South, Range 29 East, NMPM, Eddy County, New Mexico as follows:

• Under <u>Case 23171</u>, Mewbourne seeks to pool a standard 309.91-acre horizontal well spacing unit in the Wolfcamp formation comprised of Lot 6 (NW4SW4 equivalent),

NE4SW4, N2SE4 of irregular Section 6 and N2S2 of Section 5. Said horizontal spacing unit is to be initially dedicated to the proposed **Sig 6/5 WOLI Fed 1H** well to be horizontally drilled from a surface location in Lot 7 (SW4SW4 equivalent) of irregular Section 6 to a bottom hole location in NE4SE4 (Unit I) of Section 5.

• Under <u>Case 23172</u>, Mewbourne seeks to pool a standard 309.93-acre horizontal well spacing unit in the Wolfcamp formation comprised of Lot 6 (NW4SW4 equivalent), SE4SW4, S2SE4 of irregular Section 6 and S2S2 of Section 5. Said horizontal spacing unit is to be initially dedicated to the proposed **Sig 6/5 WOMP Fed 1H** well to be horizontally drilled from a surface location in Lot 7 (SW4SW4 equivalent) of irregular Section 6 to a bottom hole location in SE4SE4 (Unit P) of Section 5.

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	ESTIMATED TIME	EXHIBITS	
Tyler Jolly, Landman	Affidavit	Approx. 6	
Charles Crosby, Geology	Affidavit	Approx. 3	

PROCEDURAL MATTERS

Mewbourne intends to present these consolidated cases by self-affirmed statements if they remain unopposed at the time of hearing

Respectfully submitted,

HOLLAND & HART LLP

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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 154444

QUESTIONS

Operator:	OGRID:
MEWBOURNE OIL CO	14744
P.O. Box 5270	Action Number:
Hobbs, NM 88241	154444
	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.	