# 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. 23206

# **AMENDED PRE-HEARING STATEMENT**

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

P.O. Box 1056

Santa Fe, New Mexico 87504

Attention:

Brad Dunn

**OPPONENT** 

COG Operating LLC

ConocoPhillps Company

OPPONENT'S ATTORNEY

Ocean Munds-Dry

Beth Ryan

Jiby Rittenhouse

#### STATEMENT OF THE CASE

#### APPLICANT

Mewbourne Oil Company seeks an order pooling all mineral interests in the Wolfcamp formation underlying a horizontal spacing unit comprised of the S/2 of Section 32 and the S/2 of Section 33, Township 23 South, Range 27 East, N.M.P.M., Eddy County, New Mexico The unit will be dedicated to

- (a) The Viper 32/33 W0LI State. Com. Well No. 1H, with a first take point in the NW/4SW/4 of Section 32 and a last take point in the NE/4SE/4 of Section 33;
- (b) The Viper 32/33 W0MP State Com. Well No. 1H, with a first take point in the SW/4SW/4 of Section 32 and a last take point in the SE/4SE/4 of Section 33; and
- (c) The Viper 32/33 W2MP State Com. Well No. 1H, with a first take point in the SW/4SW/4 of Section 32 and a last take point in the SE/4SE/4 of Section 33.

The S/2 of Section 32 and the S/2 of Section 33 will be dedicated to the wells. 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 EVIDENCE

### **APPLICANT**

<u>WITNESSES</u> <u>EST. TIME</u> <u>EXHIBIT</u>

Carson Cullen 10 min. Approx. 5

(landman)

Tyler Hill 10 min. Approx.5

(geologist)

## **OPPONENT**

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

#### PROCEDURAL MATTERS

Applicant will present this case by affidavit if it is unopposed.

Mewbourne and COG/ConocoPhillips are negotiating a JOA. If not signed by next week, Mewbourne will voluntarily continue the case.

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 \_\_\_\_\_ day of February, 2023 by e-mail:

Ocean Munds-Dry - ocean@conocophillips.com

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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 184679

#### **QUESTIONS**

Operator:	OGRID:
MEWBOURNE OIL CO	14744
P.O. Box 5270	Action Number:
Hobbs, NM 88241	184679
	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.