

**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. 23674 & 23675

APPLICANT'S CONSOLIDATED PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Mewbourne Oil Company

ATTORNEY

Michael H. Feldewert, Esq.
Adam G. Rankin, Esq.
Julia Broggi, Esq.
Paula M. Vance, Esq.
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OTHER PARTIES

None

ATTORNEY

APPLICANT'S STATEMENT OF CASE

In these consolidated cases, Mewbourne seeks an order pooling all uncommitted interests in the Bone Spring formation [Lusk; Bone Spring North Pool (41450)] underlying standard horizontal spacing units in the N2 equivalent of Sections 29 and 30, Township 18 South, Range 32 East, NMPM, Lea County, New Mexico, as follows:

- **Case 23674** seeks to pool a standard 321.07-acre horizontal well spacing unit in the Bone Spring formation underlying the N2N2 of Section 29 and the N2NE4, NE4NW4 and Lot 1 (NW4NW4 equivalent) of irregular 30. This spacing unit will be initially dedicated to the proposed **Thundercloud 29/30 B2AD Fed Com 1H** well to be horizontally drilled with a first take point in the NE4NE4 (Unit A) of Section 29 and a last take point in the NW4NW4 equivalent (Lot 1) of irregular Section 30.
- **Case 23675** seeks to pool a standard 321.09-acre horizontal well spacing unit in the Bone Spring formation underlying the S2N2 of Sections 29 and the S2NE4, SE4NW4, Lot 2 (SW4NW4 equivalent) of irregular Section 30. This spacing unit will be initially dedicated to the proposed **Thundercloud 29/30 B2HE Fed Com 1H** well to be horizontally drilled with a first take point in the SE4NE4 (Unit H) of Section 29 and a last take point in the SW4NW4 equivalent (Lot 2) of irregular Section 30.

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
Thomas Sloan, Landman	Affidavit	Approx. 5
Jordan Carrell, Geology	Affidavit	Approx. 3

PROCEDURAL MATTERS

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

Respectfully submitted,

HOLLAND & HART LLP

A handwritten signature in blue ink, appearing to read "Michael H. Feldewert", is positioned above a horizontal line.

Michael H. Feldewert

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State of New Mexico
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QUESTIONS

Action 245115

QUESTIONS

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 245115
	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.