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 NOS. 23941

APPLICANT'S PRE-HEARING STATEMENT

Mewbourne Oil Company (OGRID No. 14744), the applicant in the above-referenced case, submits this 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. Paula M. Vance, Esq. Holland & Hart LLP Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

OTHER PARTIES ATTORNEY

None

APPLICANT'S STATEMENT OF CASE

Mewbourne seeks an order pooling a 311.76-acre, more or less, standard horizontal well spacing unit in the Bone Spring formation underlying the S2S2 of Sections 19 and 20, Township 18 South, Range 29 East, NMPM, Eddy County, New Mexico. This spacing unit will be initially dedicated to the proposed **Pretty Bird 20/19 Fed Com 528H** and the **Pretty Bird 20/19 Fed Com 618H** wells to be horizontally drilled from a surface location in the SE4 of Section 20, with a first take point in the SE4SE4 (Unit P) of Section 20 and a last take point in the SW4SW4 equivalent

(Lot 4) of irregular Section 19. 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 does not expect any opposition to this pooling case and intends to present this matter self-affirmed statements.

Respectfully submitted,

HOLLAND & HART LLP

Michael H. Feldewert Adam G. Rankin 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 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 279537

QUESTIONS

Operator:	OGRID:
MEWBOURNE OIL CO	14744
P.O. Box 5270	Action Number:
Hobbs, NM 88241	279537
	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.	