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

APPLICATION OF MEWBOURNE OIL COMPANY TO VACATE ORDER NO. R-21575 AND FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

Case No. 23688

## PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Mewbourne Oil Company "(Mewbourne") as required by the Oil Conservation Division.

### **APPEARANCES**

APPLICANT'S ATTORNEY

Mewbourne Oil Company James Bruce Suite 1020 P.O. Box 1056

500 West Texas Santa Fe, New Mexico 87504

Midland, Texas 79701 505-982-2043

Attention: Braxton Blandford

OPPONENT'S ATTORNEY

Colgate Production, Holland & Hart LLP

Colgate Operating, LLC and Permian Resources Operating

Coterra Energy, Inc. and Darin Savage

Cimarex Energy Co.

EOG Resources, Inc. Jordan L. Kessler

#### STATEMENT OF THE CASE

#### **APPLICANT**

Mewbourne seeks an order pooling all uncommitted mineral interest owners in the Bone Spring formation underlying a horizontal spacing unit comprised of Lots 1-4 (the N/2N/2) of Section 3 and Lots 1-4 (the N/2N/2) of Section 4, Township 20 South, Range 29 East, NMPM. The unit will be dedicated to the Judge 3/4 B3AD Fed. Com. Well No. 1H, with a first take point in Lot 1 of Section 3 and a last take point in the Lot 4 of Section 4.

Mewbourne also seeks to vacate Order No. R-21575, which pooled the Bone Spring formation underlying the N/2N/2 of Section 2 and the N/2N/2 of Section 3, Township 20 South, Range 29 East, NMPM.

Also to be considered will be the cost of drilling, completing, testing, and equipping the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in drilling, completing, testing, and equipping the well.

## **OPPONENT**

## PROPOSED EVIDENCE

## **APPLICANT**

| WITNESSES                     | EST. TIME | <u>EXHIBIT</u> |
|-------------------------------|-----------|----------------|
| Braxton Blandford (landman)   | 10 min.   | Approx. 5      |
| Charlie Crosby<br>(geologist) | 10 min.   | Approx.5       |

## **OPPONENT**

| WITNESSES | EST. TIME | <b>EXHIBITS</b> |
|-----------|-----------|-----------------|
|-----------|-----------|-----------------|

## PROCEDURAL MATTERS

The case will be presented by affidavit if unopposed.

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 \_9 th\_ day of November, 2023 by e-mail:

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QUESTIONS

Action 284325

### **QUESTIONS**

| Operator:        | OGRID:                                   |
|------------------|--|
| MEWBOURNE OIL CO | 14744                                    |
| P.O. Box 5270    | Action Number:                           |
| Hobbs, NM 88241  | 284325                                   |
|                  | 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. |  |