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

APPLICATION OF MEWBOURNE OIL COMPANY FOR APPROVAL OF THE COUSIN EDDY FEDERAL UNIT, EDDY & LEA COUNTIES, NEW MEXICO.

CASE NO. 23953

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

APPLICANT'S STATEMENT OF CASE

Mewbourne seeks an order approving the Cousin Eddy Federal Unit consisting of approximately 9612.52 acres of the following state and federal lands situated in Eddy & Lea Counties, New Mexico:

Township 21 South, Range 31 East, NMPM, Eddy County, New Mexico

Section 13: All Section 14: All Section 21: All Section 22: All

Section 23: All

Section 24: All

Section 25: All

Section 26: All

Section 27: All

Section 28: All

Section 33: N2

Section 34: N2

Section 35: N2

Section 36: N2

Township 21 South, Range 32 East, NMPM, Lea County, New Mexico

Section 8: All

Section 17: All

Section 18: All

Mewbourne is the designated operator under the proposed Unit Agreement and the unitized interval includes all depths below the top of the Bone Spring formation. Mewbourne expects to obtain approval of the proposed Unit Agreement by a sufficient percentage of the working interest owners to provide effective control of unit operations and has received preliminary approval of the proposed unit from the New Mexico State Land Office and the Bureau of Land Management.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Adriana Salgado, Landman	Self-Affirmed Statement	Approx. 5
Nathan Cless, Geology	Self-Affirmed Statement	Approx. 3

PROCEDURAL MATTERS

Mewbourne does not expect any opposition to this application and intends to present this matter by 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 III

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

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 294759

QUESTIONS

Operator:	OGRID:
MEWBOURNE OIL CO	14744
P.O. Box 5270	Action Number:
Hobbs, NM 88241	294759
	Action Type:
l l	[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.	