# 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. 24508 & 24509

## **APPLICANT'S CONSOLIDATED PRE-HEARING STATEMENT**

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

## **APPEARANCES**

### APPLICANT ATTORNEY

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#### OTHER PARTIES ATTORNEY

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## **APPLICANT'S STATEMENT OF CASE**

In these consolidated cases, Mewbourne seeks orders pooling all uncommitted interests in the Bone Spring formation underlying the E2 of Sections 23 and 14, Township 18 South, Range 33 East, NMPM, Lea County, New Mexico, as follows:

- <u>Under Case 24508</u>, Mewbourne seeks pool a standard 320-acre horizontal well spacing unit in the Bone Spring formation underlying the E2E2 of Sections 23 and 14 to be initially dedicated to the proposed **Stone Cold 23/14 Fed Com 521H** well, to be horizontally drilled from a surface location in the NE4 of Section 26, with a first take point in the SE4SE4 (Unit P) of Section 23 and a last take point in the NE4NE4 (Unit A) of Section 14; and
- <u>Under Case 24509</u>, Mewbourne seeks to pool a standard 320-acre horizontal well spacing unit in the Bone Spring formation underlying the W2E2 of Sections 23 and 14 to be initially dedicated to the proposed **Stone Cold 23/14 Fed Com 523H** well, to be horizontally drilled from a surface location in the NE4 of Section 26, with a first take point in the SW4SE4 (Unit O) of Section 23 and a last take point in the NW4NE4 (Unit B) of Section 14.

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	Self-affirmed Statement	Approx. 5	
Charles Crosby, Geologist	Self-affirmed Statement	Approx. 3	

# **PROCEDURAL MATTERS**

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

Respectfully submitted,

**HOLLAND & HART LLP** 

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ATTORNEYS FOR MEWBOURNE OIL COMPANY

# **CERTIFICATE OF SERVICE**

I hereby certify that on July 4, 2024, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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QUESTIONS

Action 361138

#### **QUESTIONS**

Operator:	OGRID:	
MEWBOURNE OIL CO	14744	
P.O. Box 5270	Action Number:	
Hobbs, NM 88241	361138	
	Action Type:	
	[HEAR] Prehearing Statement (PREHEARING)	

#### QUESTIONS

Testimony			
Please assist us by provide the following information about your testimony.			
Number of witnesses	2		
Testimony time (in minutes)	10		