## 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. 25424-25425

# MEWBOURNE'S CONSOLIDATED PRE-HEARING STATEMENT

Mewbourne Oil Company ("Mewbourne" or "Applicant") submits this consolidated Pre-

ATTORNEY

Hearing Statement pursuant to the rules of the Oil Conservation Division.

# **APPEARANCES**

# APPLICANT

Mewbourne Oil Company ("Mewbourne") Michael H. Feldewert Adam G. Rankin Paula M. Vance Holland & Hart LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile

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

Under these consolidated cases, Mewbourne seeks orders pooling for the referenced acreage, all in Township 18 South, Range 35 East, NMPM, Lea County, New Mexico, in the Bone Spring formation (Reeves; Bone Spring [51870]) as follows:

In Case No. 25424, Mewbourne seeks an order pooling all uncommitted interest owners in a standard 320-acre, more or less, well spacing unit underlying the W/2 W/2 of Sections 14 and 23, and to initially dedicate the above-referenced horizontal spacing unit to the proposed Picanha 23/14 State Com 521H well, to be drilled

from a surface hole location and first take point in the SW/4 SW/4 (Unit M) of Section 23, to a last take point in the NW/4 NW/4 (Unit D) of Section 14; and

In Case No. 25425, Mewbourne seeks an order pooling all uncommitted interest owners in a standard 320-acre, more or less, well spacing unit underlying the E/2 W/2 of Sections 14 and 23, and to initially dedicate the above-referenced horizontal spacing unit to the proposed Picanha 23/14 State Com 523H well, to be drilled from a surface hole location in the SW/4 SW/4 (Unit M) of Section 23, a first take point in the SE/4 SW/4 (Unit N), and to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 14.

The completed interval for the wells will comply with statewide setbacks for oil wells. Mewbourne has sought but been unable to obtain voluntary agreement for the development of these lands from all interest owners in the subject spacing units. The pooling of uncommitted interest owners in the proposed spacing unit will allow Applicant to obtain a just and fair share of the oil and gas underlying the subject lands, avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.

#### APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Peyton Warren, Landman	Self-Affirmed Statement	Approx. 4
Charles Crosby, Geologist	Self-Affirmed Statement	Approx. 3

#### PROCEDURAL MATTERS

Mewbourne requests that these matters be consolidated for hearing and intends to present these cases by self-affirmed statement if there is no opposition at the time of hearing. Respectfully submitted,

### HOLLAND & HART LLP

By:

Michael H. Feldewert Adam G. Rankin Paula M. Vance Post Office Box 2208 Santa Fe, NM 87504 505-988-4421 505-983-6043 Facsimile mfeldewert@hollandhart.com agrankin@hollandhart.com

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### ATTORNEYS FOR MEWBOURNE OIL COMPANY

Sante Fe Main Office Phone: (505) 476-3441

General Information Phone: (505) 629-6116

Online Phone Directory https://www.emnrd.nm.gov/ocd/contact-us

# State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

QUESTIONS

Page 4 of 4

Action 481668

QUESTIONS		
Operator:	OGRID:	
MEWBOURNE OIL CO	14744	
P.O. Box 5270	Action Number:	
Hobbs, NM 88241	481668	
	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.	