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

APPLICATIONS OF MEWBOURNE OIL COMPANY FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NOS. 25515-25516

APPLICATIONS OF MEWBOURNE OIL COMPANY FOR APPROVAL OF OVERLAPPING HORIZONTAL WELL SPACING UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NOS. 25517-25518

## MEWBOURNE'S AMENDED CONSOLIDATED PRE-HEARING STATEMENT

Mewbourne Oil Company ("Mewbourne" or "Applicant"), the applicant in the abovereferenced matters, submits this amended consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

## <u>APPEARANCES</u>

#### APPLICANT ATTORNEY

Mewbourne Oil Company Adam G. Rankin ("Mewbourne") Paula M. Vance

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

In these consolidated cases, Mewbourne seeks orders pooling for the referenced acreage, all in Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico, as follows:

- Under Case No. 25515, Mewbourne seeks an order pooling all uncommitted interest owners in the Bone Spring formation (Malaga; Bone Spring [42780]) in a standard 320-acre, more or less, well spacing unit underlying the W/2 E/2 of Sections 16 and 21, and to initially dedicate the above-referenced spacing unit to the proposed Creedence 21/16 Fed Com 556H well (API no. 30-15-55805), to be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 28, a first take point in the SW/4 SE/4 (Unit O) of Section 21, and to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 16.
- Under Case No. 25516, Mewbourne seeks an order pooling all uncommitted interest owners in the Bone Spring formation (Malaga; Bone Spring [42780]) in a standard 320-acre, more or less, well spacing unit underlying the E/2 E/2 of Sections 16 and 21, and to initially dedicate the above-referenced spacing unit to the proposed Creedence 21/16 Fed Com 558H well (API no. 30-15-55811), to be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 28, a first take point in the SE/4 SE/4 (Unit P) of Section 21, and to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 16.
- Under Case No. 25517, Mewbourne seeks an order (1) approving a standard 320-acre, more or less, overlapping horizontal well spacing unit in the Bone Spring formation (Willow Lake; Bone Spring [64450]) underlying the W/2 E/2 of Sections 28 and 33, and (2) pooling all uncommitted interests in this acreage. Mewbourne seeks to initially dedicate the above-referenced spacing unit to the proposed Kansas 28/33 Fed Com 556H well (API no. 30-15-55804), to be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 28, a first take point in the NW/4

NE/4 (Unit B) of Section 28, and to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 33. The proposed horizontal well spacing unit will overlap the following existing spacing unit in the Bone Spring formation:

- A 160-acre horizontal well spacing unit comprised of the W/2 E/2 of Section 33, T24S-R28E, operated by COG Operating LLC and dedicated to the Really Scary Federal 4H (30-015-41670).
- Under Case No. 25518, Mewbourne seeks an order (1) approving a standard 320-acre, more or less, overlapping horizontal well spacing unit in the Bone Spring formation (Willow Lake; Bone Spring [64450]) underlying the E/2 E/2 of Sections 28 and 33, and (2) pooling all uncommitted interests in this acreage. Mewbourne seeks to initially dedicate the above-referenced spacing unit to the proposed Kansas 28/33 Fed Com 558H well (API no. 30-15-55697), to be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 28, a first take point in the NE/4 NE/4 (Unit A) of Section 28, and to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 33. The proposed horizontal well spacing unit will overlap the following existing spacing unit in the Bone Spring formation:
  - O A 160-acre horizontal well spacing unit comprised of the E/2 E/2 of Section 33, T24S-R28E, operated by COG Operating LLC and dedicated to the Really Scary Federal 5H (30-015-40241).

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.

# **APPLICANT'S PROPOSED EVIDENCE**

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Tyler Jolly, Landman	Self-Affirmed Statement	Approx. 4

Tyler Hill, 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

Bv:

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

QUESTIONS

Action 514570

#### QUESTIONS

Operator:	OGRID:
MEWBOURNE OIL CO	14744
P.O. Box 5270	Action Number:
Hobbs, NM 88241	514570
	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)	5		