## 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. 21163 and 21165-21167

### PRE-HEARING STATEMENT

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

### **APPEARANCES**

APPLICANT

Mewbourne Oil Company

Suite 1020

500 West Texas

Midland, Texas 79701

APPLICANT'S ATTORNEY

James Bruce

P.O. Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attention:

Mitch Robb

(432) 682-3715

**OPPONENT** 

EOG Resources, Inc.

OPPONENT'S ATTORNEY

Holland & Hart LLP

## STATEMENT OF THE CASE

#### **APPLICANT**

Case No. 21163: Mewbourne Oil Company seeks an order pooling all mineral interests in the Bone Spring formation in a horizontal spacing unit comprised of the N/2N/2 of Section 11 and the N/2N2 of Section 12, Township 19 South, Range 28 East, NMPM. The unit will be dedicated to the Bourbon Red 11/12 B3DA State Com. Well No. 1H, a horizontal well a first take point in the NW/4NW/4 of Section 11 and a last take point in the NE/4NE/4 of Section 12.

Case No. 21165: Mewbourne Oil Company seeks an order pooling all mineral interests in the Bone Spring formation in a horizontal spacing unit comprised of the S/2N/2 of Section 11 and the S/2N2 of Section 12, Township 19 South, Range 28 East, NMPM. The unit will be dedicated to the Bourbon Red 11/12 B3EH State Com. Well No. 1H, a horizontal well a first take point in the SW/4NW/4 of Section 11 and a last take point in the SE/4NE/4 of Section 12.

Case No. 21166: Mewbourne Oil Company seeks an order pooling all mineral interests in the Bone Spring formation in a horizontal spacing unit comprised of the N/2S/2 of Section 11 and the N/2S/2 of Section 12, Township 19 South, Range 28 East, NMPM. The unit will be dedicated to the Bourbon Red 11/12 B3LI State Com. Well No. 1H, a horizontal well a first take point in the NW/4SW/4 of Section 11 and a last take point in the NE/4SE/4 of Section 12.

Case No. 21167: Mewbourne Oil Company seeks an order pooling all mineral interests in the Bone Spring formation in a horizontal spacing unit comprised of the S/2S/2 of Section 11 and the S/2S/2 of Section 12, Township 19 South, Range 28 East, NMPM. The unit will be dedicated to the Bourbon Red 11/12 B3MP State Com. Well No. 1H, a horizontal well a first take point in the SW/4SW/4 of Section 11 and a last take point in the SE/4SE/4 of Section 12.

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

#### **OPPONENT**

#### PROPOSED EVIDENCE

#### **APPLICANT**

WITNESSES	EST. TIME	EXHIBIT
Mitch Rob	15 min.	Approx. 10
(landman)		

Charles Crosby	15 min.	Approx.8
(geologist)		rpprox.o

#### **OPPONENTS**

WITNESSES	EST. TIME	<b>EXHIBIT</b>
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# PROCEDURAL MATTERS

- 1. The cases should be consolidated for hearing.
- 2. If the cases are unopposed they will be presented by affidavit.

Respectfully submitted,

James Bruce

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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 \_\_\_\_\_\_ day of April, 2020 by e-mail:

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