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

APPLICATION OF MEWBOURNE OIL
COMPANY FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO   **Case No. 21361**

MEWBOURNE OIL COMPANY'S
PRE-HEARING STATEMENT

Mewbourne Oil Company ("Mewbourne") submits its Pre-Hearing Statement pursuant to

the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT   APPLICANT'S ATTORNEYS

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STATEMENT OF THE CASE

Mewbourne seeks an order pooling all uncommitted mineral interests in the Bone Spring formation in a 320-acre, more or less, standard horizontal spacing unit comprised of the E/2 W/2 of Section 33 and the E/2 W/2 of Section 28, Township 20 South, Range 30 East in Eddy County, New Mexico. The horizontal spacing unit will be dedicated to the Sidecar 33/28 B3NC Fed Com #1H well, which will be horizontally drilled from a surface location in Lot 1 in Section 4, Township 21 South, Range 29 East to a bottom hole location in Unit C in Section 28, Township 20 South, Range 30 East. The completed interval for the well will be orthodox. Also to be considered will be the costs of drilling and completing the well and the allocation of the costs, the designation of Mewbourne as the operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The granting of Mewbourne's application will serve the interests of conservation, the protection of correlative rights, and the prevention of waste.

PROPOSED EVIDENCE

WITNESS	ESTIMATED TIME	EXHIBITS
Tyler Jolly (Landman)	30 minutes	Approx. 10
Nate Cless (Geologist)	30 minutes	Approx. 6
Travis Cude (Engineer)	20 minutes	Approx. 6

Mewbourne reserves the right to call a rebuttal witness(es) if appropriate.

PROCEDURAL MATTERS

Mewbourne has filed a motion requesting that this matter be referred to the New Mexico Oil Conservation Commission ("Commission") for hearing in conjunction with the *de novo* hearing in Commission Case Nos. 21277 through 21280.

Respectfully submitted,

HINKLE SHANOR, LLP

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Counsel for Mewbourne Oil Company

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of July, 2020, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

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