# 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. 21715 - 21718

## **PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by Mewbourne Oil Company ("Mewbourne") 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:

Brad Dunn

(432) 682-3715

**OPPONENT** 

OPPONENT'S ATTORNEY

#### STATEMENT OF THE CASE

#### **APPLICANT**

Case No. 21715: Mewbourne Oil Company seeks an order pooling all mineral interest owners in the Wolfcamp formation in a horizontal spacing unit underlying the N/2NE/4 of Section 11 and the N/2N/2 of Section 12, Township 21 South, Range 27 East, NMPM. The unit will be dedicated to the Cholula 12/11 W0AB Fed. Com. Well No. 1H, a horizontal well with a first take point in the NE/4NE/4 of Section 12 and a last take point in the NW/4NE/4 of Section 11.

Case No. 21716: Mewbourne Oil Company seeks an order pooling all mineral interest owners in the Wolfcamp formation in a horizontal spacing unit underlying the N/2SE/4 of Section 11 and the N/2S/2 of Section 12, Township 21 South, Range 27 East, NMPM. The unit will be dedicated to the Cholula 12/11 W0IJ Fed. Com. Well No. 2H, a horizontal well with a first take point in the NE/4SE/4 of Section 12 and a last take point in the NW/4SE/4 of Section 11.

Case No. 21717: Mewbourne Oil Company seeks an order pooling all mineral interest owners in the Wolfcamp formation in a horizontal spacing unit underlying the S/2NE/4 of Section 11 and the S/2N/2 of Section 12, Township 21 South, Range 27 East, NMPM. The unit will be dedicated

to the Cholula 12/11 W0HG Fed. Com. Well No. 2H, a horizontal well with a first take point in the SE/4NE/4 of Section 12 and a last take point in the SW/4NE/4 of Section 11.

<u>Case No. 21718</u>: Mewbourne Oil Company seeks an order pooling all mineral interest owners in the Wolfcamp formation in a horizontal spacing unit underlying the S/2SE/4 of Section 11 and the S/2S/2 of Section 12, Township 21 South, Range 27 East, NMPM. The unit will be dedicated to the Cholula 12/11 W0PO Fed. Com. Well No. 1H, a horizontal well with a first take point in the SE/4SE/4 of Section 12 and a last take point in the SW/4SE/4 of Section 11.

Also to be considered will be the cost of drilling, completing, and equipping 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, completing, and equipping the wells.

## **OPPONENT**

#### PROPOSED EVIDENCE

## **APPLICANT**

WITNESSES Brad Dunn (landman)	EST. TIME 15 min.	EXHIBIT Approx. 8
Nate Cless	15 min.	Approx. 12

#### **OPPONENT**

(geologist)

<u>WITNESSES</u> <u>EST. TIME</u> <u>EXHIBIT</u>

## PROCEDURAL MATTERS

These cases should be consolidated for hearing. They will be submitted by affidavit if there is no opposition.

Respectfully submitted,

James Bruce

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Attorney for Mewbourne Oil Company