## 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. \_\_\_\_\_

## APPLICATION

Pursuant to NMSA § 70-2-17, Mewbourne Oil Company ("Mewbourne") applies for an order pooling all uncommitted mineral interests in the Wolfcamp formation in a 640-acre, more or less, standard horizontal spacing unit comprised of the S/2 of Section 17 and the S/2 of Section 16, Township 20 South, Range 29 East in Eddy County, New Mexico. In support of its application, Mewbourne states:

Mewbourne (OGRID No. 14744) is a working interest owner in the S/2 of Section
17 and the S/2 of Section 16 and has the right to drill wells thereon.

- 2. The horizontal spacing unit will be dedicated to the following wells:
  - a. Glock 17/16 WOLI Fed Com #1H well, which will be horizontally drilled from a surface location in Unit L in Section 17 to a bottom hole location in Unit H in Section 16, Township 20 South, Range 29 East; and
  - B. Glock 17/16 WOMP Fed Com #1H well, which will be horizontally drilled from a surface location in Unit M in Section 17 to a bottom hole location in Unit P in Section 16, Township 20 South, Range 29 East.
- 3. The completed intervals for the wells will be orthodox.

4. Mewbourne has undertaken diligent, good-faith efforts to obtain voluntary agreements from all mineral interest owners to participate in the drilling of the wells but has been unable to obtain voluntary agreements from all of the mineral interest owners.

5. The pooling of all uncommitted mineral interests in the Wolfcamp formation underlying the S/2 of Section 17 and the S/2 of Section 16 will avoid the drilling of unnecessary wells, prevent waste, and protect correlative rights.

6. In order to allow Mewbourne to obtain its just and fair share of the oil and gas underlying the subject lands, all uncommitted mineral interests in the horizontal spacing unit should be pooled.

WHEREFORE, Mewbourne requests that this application be set for hearing on March 5, 2020 and that, after notice and hearing, the Division enter an order:

A. Pooling all uncommitted mineral interests in the Wolfcamp formation underlying the S/2 of Section 17 and the S/2 of Section 16;

B. Designating Mewbourne as the operator of the Glock 17/16 WOLI Fed Com #1H and Glock 17/16 WOMP Fed Com #1H wells;

C. Authorizing Mewbourne to recover its costs of drilling, equipping, and completing the Glock 17/16 WOLI Fed Com #1H and Glock 17/16 WOMP Fed Com #1H wells and allocating the costs among the wells' working interest owners;

D. Approving the actual operating charges and costs of supervision during drilling and after completion, together with a provision for adjusting the rates pursuant to the COPAS accounting procedure; and

E. Imposing a 200% penalty for the risk assumed by Mewbourne in drilling and completing the Glock 17/16 WOLI Fed Com #1H and Glock 17/16 WOMP Fed Com #1H wells against any mineral interest owner who does not voluntarily participate in the drilling of the wells.

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Respectfully submitted,

HINKLE SHANOR LLP

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Counsel for Mewbourne Oil Company

**Case No.** \_\_\_\_\_\_: **Application of Mewbourne Oil Company for compulsory pooling, Eddy County, New Mexico.** Applicant seeks an order pooling all uncommitted mineral interests in the Wolfcamp formation in a 640-acre, more or less, standard horizontal spacing unit comprised of the S/2 of Section 17 and the S/2 of Section 16, Township 20 South, Range 29 East, NMPM, in Eddy County. The horizontal spacing unit will be dedicated to the following wells: Glock 17/16 WOLI Fed Com #1H well, which will be horizontally drilled from a surface location in Unit L in Section 17 to a bottom hole location in Unit H in Section 16, Township 20 South, Range 29 East; and the Glock 17/16 WOMP Fed Com #1H well, which will be horizontally drilled from a surface location in Unit M in Section 17 to a bottom hole location in Unit P in Section 16, Township 20 South, Range 29 East. The completed intervals for the wells will be orthodox. Also to be considered will be the costs of drilling and completing the wells and the allocation of the costs, the designation of Mewbourne Oil Company as the operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells. The wells are located approximately thirteen (13) miles northeast of Carlsbad, New Mexico.