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

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

Case Nos. 22423 - 22426

# **EPRE-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

Attention:

Braxton Blandford

(432) 682-3715

**OPPONENT** 

Matafdor Production Company

COG Operating LLC

OPPONENT'S ATTORNEY

APPLICANT'S ATTORNEY

Santa Fe, New Mexico 87504

Holland & Hart LLP

James Bruce P.O. Box 1056

(505) 982-2043

Ocean Munds-Dry et al.

#### STATEMENT OF THE CASE

#### APPLICANT

Case No. 22423: Mewbourne Oil Company seeks an order pooling all uncommitted mineral interest owners in the Bone Spring formation underlying a horizontal spacing unit comprised of the N/2NE/4 of Section 11 and the N/2N/2 of Section 12, Township 18 South, Range 31 East, NMPM (Eddy County), and Lot 1 and the NE/4NW/4 (the N/2NW/4) of Section 7, Township 18 South, Range 32 East, NMPM (Lea County). The unit will be dedicated to the Iron Islands 11/7 B2BC Fed. Com. Well No. 1H, with a first take point in the NW/4NE/4 of Section 11 and a last take point in the NE/4NW/4 of Section 7.

Case No. 22424: Mewbourne Oil Company seeks an order pooling all uncommitted mineral interest owners in the Bone Spring formation underlying a horizontal spacing

unit comprised of the S/2NE/4 of Section 11 and the S/2N/2 of Section 12, Township 18 South, Range 31 East, NMPM (Eddy County), and Lot 2 and the SE/4NW/4 (the S/2NW/4) of Section 7, Township 18 South, Range 32 East, NMPM (Lea County). The unit will be dedicated to the Iron Islands 11/7 B2GF Fed. Com. Well No. 1H, with a first take point in the SW/4NE/4 of Section 11 and a last take point in the SE/4NW/4 of Section 7.

<u>Case No. 22425</u>: Mewbourne Oil Company seeks an order pooling all uncommitted mineral interest owners in the Bone Spring formation underlying a horizontal spacing unit comprised of the N/2SE/4 of Section 11 and the N/2S/2 of Section 12, Township 18 South, Range 31 East, NMPM (Eddy County), and Lot 3, NE/4SW/4, and the N/2SE/4 (the N/2S/2) of Section 7, Township 18 South, Range 32 East, NMPM (Lea County). The unit will be dedicated to the Iron Islands 11/7 B2JI Fed. Com. Well No. 1H, with a first take point in the NW/4SE/4 of Section 11 and a last take point in the NE/4SE/4 of Section 7.

Case No. 22426: Mewbourne Oil Company seeks an order pooling all uncommitted mineral interest owners in the Bone Spring formation underlying a horizontal spacing unit comprised of the S/2SE/4 of Section 11 and the S/2S/2 of Section 12, Township 18 South, Range 31 East, NMPM (Eddy County), and Lot 4, SE/4SW/4, and the S/2SE/4 (the S/2S/2) of Section 7, Township 18 South, Range 32 East, NMPM (Lea County). The unit will be dedicated to the Iron Islands 11/7 B2OP Fed. Com. Well No. 1H, with a first take point in the SW/4SE/4 of Section 11 and a last take point in the SE/4SE/4 of Section 7.

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 cost plus 200% charge for the risk involved in drilling, completing testing, and equipping the wells.

### **OPPONENT**

#### PROPOSED EVIDENCE

### <u>APPLICANT</u>

| WITNESSES                   | EST. TIME | <u>EXHIBITS</u> |
|-----------------------------|-----------|-----------------|
| Braxton Blandford (landman) | 20 min.   | Approx. 16      |
| Charles Crosby (geologist)  | 10 min.   | Approx. 6       |

# **OPPONENTS**

**WITNESSES** 

EST. TIME

**EXHIBITS** 

# PROCEDURAL MATTERS

If these cases are unopposed they will be submitted by affidavit. They should be consolidated for hearing.

Respectfully submitted,

James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

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 March, 2023 by e-mail:

Adam Rankin - <u>agrankin@hollandhart.com</u>
Julia Broggi - <u>jbroggi@hollandhart.com</u>
\Paula Vance - <u>pmvance@hollandhart.com</u>

James Bruce

District III

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720

District II 811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

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

QUESTIONS

Action 202472

### **QUESTIONS**

| Operator:        | OGRID:                                   |
|------------------|------------------------------------------|
| MEWBOURNE OIL CO | 14744                                    |
| P.O. Box 5270    | Action Number:                           |
| Hobbs, NM 88241  | 202472                                   |
|                  | Action Type:                             |
| l l              | [HEAR] Prehearing Statement (PREHEARING) |

#### QUESTIONS

| Testimony                                                                   |               |  |
|-----------------------------------------------------------------------------|---------------|--|
| Please assist us by provide the following information about your testimony. |               |  |
| Number of witnesses                                                         | Not answered. |  |
| Testimony time (in minutes)                                                 | Not answered. |  |