

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

**APPLICATIONS OF MEWBOURNE OIL
COMPANY FOR COMPULSORY POOLING,
ETC., EDDY COUNTY, NEW MEXICO.**

Case Nos. 23445 & 23446

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: Mitch Robb
(432) 682-3715

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

OPPONENT

Matafdor Production Company
COG Operating LLC

OPPONENT'S ATTORNEY

Holland & Hart LLP
Ocean Munds-Dry *et al.*

STATEMENT OF THE CASE

APPLICANT

Case No. 23445: Mewbourne Oil Company seeks an order pooling all uncommitted mineral interest owners in the Wolfcamp formation underlying a horizontal spacing unit comprised of the NW/4 of Section 14 and the W/2 of Section 11, Township 26 South, Range 29 East, NMPM. The unit will be dedicated to: (a) the Fuller 14/11 W1ED Fed. Com. Well No. 1H, with a first take point in the SW/4NW/4 of Section 14 and a last take point in the NW/4NW/4 of Section 11; (b) the Fuller 14/11 W1ED Fed. Com. Well No. 2H, with a first take point in the SW/4NW/4 of Section 14 and a last take point in the NW/4NW/4 of Section 11; (c) the Fuller 14/11 W1FC Fed. Com. Well No. 1H, with a first take point in the SE/4NW/4 of Section 14 and a last take point in the NE/4NW/4 of Section 11; and (d) the Fuller 14/11 W1FC Fed. Com. Well No. 2H, with a first take point in the SE/4NW/4 of Section 14 and a last take point in the NE/4NW/4 of Section 11. The first and last take points of the wells will be 100 feet from the end lines of the well unit, and applicant requests approval of the unorthodox well locations; and

Case No. 23446: Mewbourne Oil Company seeks an order pooling all uncommitted mineral interest owners in the Bone Spring formation underlying a non-standard horizontal spacing unit

comprised of the Bone Spring formation underlying a horizontal well unit comprised of the NW/4 of Section 14 and the W/2 of Section 11, Township 26 South, Range 29 East, NMPM. The unit will be dedicated to: (a) the Fuller 14/11 B2ED Fed. Com. Well No. 1H, with a first take point in the SW/4NW/4 of Section 14 and a last take point in the NW/4NW/4 of Section 11; and (b) the Fuller 14/11 B2FC Fed. Com. Well No. 2H, with a first take point in the SE/4NW/4 of Section 14 and a last take point in the NE/4NW/4 of Section 11. Applicant also requests approval of the non-standard unit.

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

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Mitch Robb (landman)	20 min.	Approx. 8
Tyler Hill (geologist)	10 min.	Approx. 6

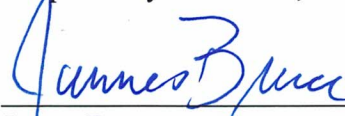
OPPONENTS

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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PROCEDURAL MATTERS

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

Respectfully submitted,



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

QUESTIONS

Action 202485

QUESTIONS

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 202485
	Action Type: [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.