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

APPLICATIONS OF MEWBOURNE OIL COMPANYFOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NOS. 24386 & 24387

APPLICANT'S CONSOLIDATED PRE-HEARING STATEMENT

Mewbourne Oil Company (OGRID No. 14744), the applicant in the above-referenced cases, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil

Conservation Division.

APPEARANCES

APPLICANT

Mewbourne Oil Company

ATTORNEY

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APPLICANT'S STATEMENT OF CASE

In these consolidated cases, Mewbourne seeks orders pooling all uncommitted interests in the Bone Spring formation underlying the NE4 of Section 3 and the N2 of Section 2, Township 18

South, Range 29 East, NMPM, Eddy County, New Mexico as follows:

• Under Case 24386, Mewbourne seeks to pool a standard 240--acre horizontal well

spacing unit comprised of the N2NE4 of Section 3 and the N2N2 of Section 2 to be

initially dedicated to the proposed **Swanson 3/2 Fed Com 511H** well, to be horizontally drilled from a surface location in the NE4 of Section 2, with a first take point in the NE4N4 (Unit A) of Section 2 and a last take point in the NW4NE4 (Unit B) of Section 3; and

Under Case 24387, Mewbourne seeks to pool a standard 240-acre horizontal well spacing unit comprised of the S2NE4 of Section 3 and the S2N2 of Section 2 to be initially dedicated to the proposed Swanson 3/2 Fed Com 513H well, to be horizontally drilled from a surface location in the NE4 of Section 2, with a first take point in the SW4NE4 (Unit H) of Section 2 and a last take point in the SW4NE4 (Unit G) of Section 3.

Mewbourne has sought but been unable to obtain voluntary agreement for the development of these lands from all mineral interest owners in the subject acreage.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Adriana Salgado, Landman	Self-affirmed Statement	Approx. 6
Charles Crosby, Geology	Self-affirmed Statement	Approx. 4

PROCEDURAL MATTERS

Mewbourne intends to present these consolidated cases by self-affirmed statements if they remain unopposed at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

+ Fellevers Stuchal

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ATTORNEYS FOR MEWBOURNE OIL COMPANY