# 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 ATTORNEY

Mewbourne Oil Company Michael H. Feldewert, Esq.

Adam G. Rankin, Esq. Paula M. Vance, Esq. Holland & Hart LLP Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile mfeldewert@hollandhart.com agrankin@hollandhart.com pmvance@hollandhart.com

## **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.

## <u>APPLICANT'S PROPOSED EVIDENCE</u>

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

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com
pmvance@hollandhart.com

ATTORNEYS FOR MEWBOURNE OIL COMPANY

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

District III 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 336827

### **QUESTIONS**

Operator:	OGRID:
MEWBOURNE OIL CO	14744
P.O. Box 5270	Action Number:
Hobbs, NM 88241	336827
	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.	