

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

FEB 20 2018 PM 02:41

**APPLICATION OF MEWBOURNE OIL COMPANY FOR
A NON-STANDARD SPACING AND PRORATION UNIT AND
COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.**

CASE NOS. 15913, 15914

**APPLICATION OF RSC RESOURCES, LP FOR
COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO**

**15968
CASE NO. 15986**

PRE-HEARING STATEMENT

RSC RESOURCES, LP, HOLD THE DOOR, L.P., PJT ENERGY, INC. and P.T. RESOURCES, L.P. ("RSC RESOURCES, ET AL."), provide this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT:

RSC RESOURCES, LP, HOLD THE
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RSC RESOURCES, LP's ATTORNEY

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*Attorneys for Devon Energy Production
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STATEMENT OF THE CASE

In Case No. 15913, the Applicant Mewbourne Oil Company seeks an order authorizing a 478.13-acre non-standard spacing and proration unit comprised of the W/2 of Section 6 and the NW/4 of Section 7, Township 24 South, Range 29 East, Eddy County, New Mexico and pooling all interests in the Wolfcamp formation underlying this acreage for the drilling of its **Pecos Valley W2ED Fed. Com. No. 1H well**. In Case No. 15914, Mewbourne Oil Company seeks an order authorizing a 479.88-acre non-standard spacing and proration unit comprised of the E/2 of Section 6 and the NE/4 of Section 7, Township 24 South, Range 29 East, Eddy County, New Mexico and pooling all interests in the Wolfcamp formation underlying this acreage for the drilling of its **Pecos Valley W2HA Fed. Com. No. 1H well**. Mewbourne's well proposals and

development plans conflict with the development plans for Section 6 with mile-long long laterals that had been made previously by RSC Resources, LP, et al. In addition to contesting Mewbournes wells and development plans, RSC Resources will seek a different risk charge than that provided in Subsection A of 19.15.13.8 NMAC.

In Case No. 15986, the Applicant is RSC Resources, LP, et al. RSC seeks an order pooling all interests in the Wolfcamp formation underlying Lots 3-7, SE/4 NW/4, and E/2 SW/4 (W/2 equivalent) of Section 6, Township 24 South, Range 29 East, NMPM, Eddy County, New Mexico. Applicant seeks to establish a standard 318.77-acre \pm spacing and proration unit (project area) in the Purple Sage Wolfcamp Gas Pool (98220) in the W/2 of Section 6. The unit will be dedicated to six wells to be drilled by Applicant as follows: (1) the **Harroun 6 Federal Com 1H** (2) the **Harroun 6 Federal Com 2H** (3) the **Harroun 6 Federal Com 3H** (4) the **Harroun 6 Federal Com 4H** (5) the **Harroun 6 Federal Com 5H** and (6) the **Harroun 6 Federal Com 6H**. The surface and bottom-hole locations for each of these wells are set forth in the Application. The completed interval for each well will remain within the 330-foot standard offset established by the Special Pool Rules for the Purple Sage Wolfcamp Gas Pool.

PROPOSED EVIDENCE

| <u>MEWBOURNE'S WITNESSES</u> | <u>EST. TIME</u> | <u>EXHIBITS</u> |
|----------------------------------|------------------|-----------------|
| | | |
| <u>OTHER PARTIES' WITNESSES</u> | <u>EST. TIME</u> | <u>EXHIBITS</u> |
| RSC RESOURCES, LP, ET AL. | | |
| Patrick Tower, Landman | 25 min. | 15 |
| Randall Cate, Petroleum Engineer | 60 min. | 15 |

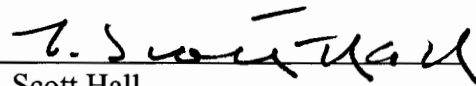
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|---------------------------------------|------------------|-----------------|
| CHEVRON USA, INC. | <u>EST. TIME</u> | <u>EXHIBITS</u> |
| COG OPERATING INC. | <u>EST. TIME</u> | <u>EXHIBITS</u> |
| DEVON ENERGY PRODUCTION COMPANY, L.P. | <u>EST. TIME</u> | <u>EXHIBITS</u> |

PROCEDURAL MATTERS

Case No. 15914 was recently re-advertised for the March 8, 2018 examiner hearing docket to include an additional well, the **Pecos Valley W0AH Fed. Com. Well No. 2H**. It is recommended that all three cases be consolidated for hearing. Please note: Counsel for RSC Resources, et al. is unavailable to attend a hearing on March 8th.

Respectfully submitted,

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By: 

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on February 20, 2018:

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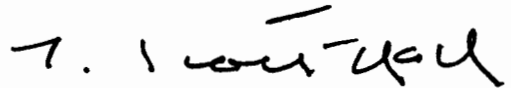
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