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

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

Case Nos. 21058 through 21061

PRE-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

APPLICANT'S ATTORNEY

James Bruce P.O. Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attention:

Corey Mitchell

(432) 682-3715

OPPONENT

Strata Production Co.

OPPONENT'S ATTORNEY

Sharon Shaheen

STATEMENT OF THE CASE

APPLICANT

Case No. 21058: Mewbourne Oil Company seeks an order pooling all mineral interests in the Wolfcamp formation in a horizontal spacing unit comprised of the N/2N/2 of Section 25 and the N/2NE/4 of Section 26, Township 20 South, Range 28 East, NMPM. The unit will be dedicated to the Foxhole 25/26 W0AB Fed Com. Well No. 1H, with a first take point in the NE/4NE/4 of 25 and a final take point in the NW/4NE/4 of Section 26.

Case No. 21059: Mewbourne Oil Company seeks an order pooling all mineral interests in the Wolfcamp formation in a horizontal spacing unit comprised of the N/2S/2 of Section 25 and the N/2SE/4 of Section 26, Township 20 South, Range 28 East, NMPM. The unit will be dedicated to the Foxhole 25/26 W0IJ Fed Com. Well No. 1H, with a first take point in the NE/4SE/4 of 25 and a final take point in the NW/4SE/4 of Section 26

Case No. 21060: Mewbourne Oil Company seeks an order pooling all mineral interests in the Wolfcamp formation in a horizontal spacing unit comprised of the S/2N/2 of Section 25 and the S/2NE/4 of Section 26, Township 20 South, Range 28 East, NMPM. The unit will be dedicated to the Foxhole 25/26 W0HG Fed Com. Well No. 1H, with a first take point in the SE/4NE/4 of 25 and a final take point in the SW/4NE/4 of Section 26.

Case No. 21061: Mewbourne Oil Company seeks an order pooling all mineral interests in the Wolfcamp formation in a horizontal spacing unit comprised of the S/2S/2 of Section 25 and the S/2SE/4 of Section 26, Township 20 South, Range 28 East, NMPM. The unit will be dedicated to the Foxhole 25/26 W0PO Fed Com. Well No. 1H, with a first take point in the SE/4SE/4 of 25 and a final take point in the SW/4SE/4 of Section 26.

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 200% charge for the risk involved in drilling and completing the wells.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

WITNESSES Adriana Salgado (landman)	EST. TIME 15 min.	EXHIBIT Approx. 10
Charles Crosby (geologist)	15 min.	Approx.8

OPPONENTS

WITNESSES	EST. TIME	EXHIBIT

PROCEDURAL MATTERS

- 1. The cases should be consolidated for hearing.
- 2. If the cases are unopposed they will be presented by affidavit.

Respectfully submitted,

James Bruce

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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 20th day of January, 2020 by e-mail:

Sharon Shaheen <u>sshaheen@montand.com</u>

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