

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

**APPLICATION OF MEWBOURNE OIL  
COMPANY FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO**

**Case No. 21157**

**MEWBOURNE OIL COMPANY'S  
PRE-HEARING STATEMENT**

Mewbourne Oil Company ("Mewbourne") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

Mewbourne is the applicant in this case. Its business address is 500 West Texas Ave., Suite 1020, Midland, Texas 79701. Mewbourne is represented by the undersigned counsel.

**STATEMENT OF THE CASE**

Mewbourne's application seeks an order pooling all uncommitted mineral interests in the Bone Spring formation in a 240-acre, more or less, standard horizontal spacing unit comprised of the E/2 E/2 of Section 26 and the E/2 SE/4 of Section 23, Township 21 South, Range 34 East in Lea County, New Mexico. The horizontal spacing unit will be dedicated to the Inland 26/23 B2PI State Com #1H well, which will be horizontally drilled from a surface location in Unit P in Section 26 to a bottom hole location in Unit I in Section 23, Township 21 South, Range 34 East. The completed interval for the well will be orthodox. Also to be considered will be the costs of drilling and completing the well and the allocation of the costs, the designation of Mewbourne Oil Company as the operator of the well, and a 200% charge for the risk involved in drilling and completing the wells.

**PROPOSED EVIDENCE**

| <u>WITNESS</u>                | <u>ESTIMATED TIME</u> | <u>EXHIBITS</u> |
|-------------------------------|-----------------------|-----------------|
| Brad Dunn<br>(Landman)        | 10 minutes            | Approx. 12      |
| Jordan Carrell<br>(Geologist) | 10 minutes            | Approx. 6       |

Mewbourne reserves the right to call a rebuttal witness(es) if appropriate.

**PROCEDURAL MATTERS**

Mewbourne is not aware of any procedural matters to be resolved prior to the hearing. If there is no opposition to its application, Mewbourne will present its case by affidavit.

HINKLE SHANOR, LLP

/s/ Dana S. Hardy  
Dana S. Hardy  
P.O. Box 2068  
Santa Fe, NM 87504-2068  
Phone: (505) 982-4554  
Facsimile: (505) 982-8623  
[dhardy@hinklelawfirm.com](mailto:dhardy@hinklelawfirm.com)

*Counsel for Mewbourne Oil Company*