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

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

APPLICATIONS OF COLGATE CORPORATION
FOR COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO.
Case No. 21072, 21074, 21075, and 21092

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Mewbourne Oil Company ("Mewbourne") as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Colgate Corporation

APPLICANT'S ATTORNEY

Earl Debrine Lance Hough

OPPONENTS

Mewbourne Oil Company

OPPONENTS' ATTORNEYS

James Bruce

MRC Delaware Resources, LLC

EOG Resources, Inc.

Michael Feldewert, et al.

Magnum Hunter Production, Inc.

Sharon Shaheen John McIntyre

Yates Energy Corporation

Jalpeno Corporation

J.E. Gallegos Michael Condon

STATEMENT OF THE CASE

APPLICANT

Colgate Corporation ("Colgate") seeks orders pooling all mineral interests in the Bone Spring formation collectively underlying all of Section 25, Township 19 South, Range 29 East, NMPM and all of 30, Township 19 South, Range 30 East, NMPM.

OPPONENT

<u>Mewbourne</u>: Mewbourne is a working interest owner in the subject lands, and is sending proposal letters to the interest owners for wells conflicting with Colgate's, and will file counterapplications under which Mewbourne is the proposed operator. Thus, it opposes Colgate's's applications.

PROPOSED EVIDENCE

APPLICANT

(engineer)

WITNESSES EST. TIME **EXHIBITS OPPONENT** WITNESSES EST. TIME **EXHIBITS** Mewbourne Tyler Jolly 20 min. Approx. 12 (landman) Charles Crosby 15 min. Approx. 10 (geologist) Travis Cude 20 min. Approx. 6

PROCEDURAL MATTERS

Due to the current situation regarding contested Division cases, Mewbourne requests that the Division continue the above cases to a date after May 14, 2020.

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 day of April, 2020 by e-mail:

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