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

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

Case No. 21365

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant 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:

Mitch Robb (432) 682-3715

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Mewbourne Oil Company seeks an order pooling all mineral interests in the Wolfcamp formation underlying Lots 3, 4, S/2NW/4, and SW/4 (the W/2) of Section 2, Township 24 South, Range 28 East, NMPM. The unit will be dedicated to (i) the Skynyrd 2 W0CN Fee Well No. 1H, a horizontal well with a first take point in the NE/4NW/4 and a last take point in the SE/4SW/4 of Section 2; (ii) the Skynyrd 2 W0DM Fee Well No. 1H, a horizontal well with a first take point in the NW/4NW/4 and a last take point in the SW/4SW/4 of Section 2; and (iii) the Skynyrd 2 W0DM Fee Well No. 2H, a horizontal well with a first take point in the NW/4NW/4 and a last take point in the SW/4SW/4 of Section 2. Also to be considered will be the cost of drilling, completing, and equipping ting 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, completing, and equipping the wells.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u> <u>EST. TIME</u> <u>EXHIBIT</u>

Mitch Robb 15 min. Approx. 6

(landman)

Charles Crosby 10 min. Approx. 6 (geologists)

OPPONENT

<u>WITNESSES</u> <u>EST. TIME</u> <u>EXHIBITS</u>

PROCEDURAL MATTERS

Applicant will present this case by affidavit if it is unopposed.

Respectfully submitted,

James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attorney for Mewbourne Oil Company