# 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. 21492 & 21493

# PRE-HEARING STATEMENT

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

#### **APPEARANCES**

APPLICANT'S ATTORNEY

Mewbourne Oil Company James Bruce Suite 1020 P.O. Box 1056

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Attention: Josh Anderson

(432) 682-3715

<u>OPPONENT'S ATTORNEY</u>

EOG Resources, Inc. Holland & Hart LLP

#### STATEMENT OF THE CASE

#### **APPLICANT**

Case No. 21462: Mewbourne Oil Company seeks an order pooling all mineral interests in the Bone Spring formation in a horizontal spacing unit comprised of the N/2S/2 of Section 13 and the N/2S/2 of Section 14, Township 18 South, Range 30 East, NMPM. The unit will be dedicated to the Knox 13/14 B2IL Fed. Com. Well No. 1H, with a first take point in the NE/4SE/4 of 13 and a last take point in the NW/4SW/4 of Section 14.

Case No. 21463: Mewbourne Oil Company seeks an order pooling all mineral interests in the Bone Spring formation in a horizontal spacing unit comprised of the S/2S/2 of Section 13 and the S/2S/2 of Section 14, Township 18 South, Range 30 East, NMPM. The unit will be dedicated to the Knox 13/14 B2PM Fed. Com. Well No. 1H, with a first take point in the SE/4SE/4 of 13 and a last take point in the SW/4SW/4 of Section 14.

Also to be considered will be the cost of drilling, completing, and equipping 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
Josh Anderson
(landman)

EST. TIME
15 min.

EXHIBIT
Approx. 10

Tyler Hill 15 min. Approx.8 (geologist)

## **OPPONENTS**

WITNESSES EST. TIME EXHIBIT

# PROCEDURAL MATTERS

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

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 October, 2020 by e-mail:

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