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 21494

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:

Brad Dunn

(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 a horizontal spacing unit comprised of the W/2 of Section 35, Township 24 South, Range 28 East, NMPM and Lots 3, 4, S/2NW/4, and SW/4 (the W/2) of Section 2, Township 25 South, Range 28 East, NMPM. The unit will be dedicated to (a) the El Jefe 35/2 W0CN Fed. Com. Well No. 1H and the El Jefe 35/2 W1CN Fed. Com. Well No. 1H, with first take points in the NE/4NW/4 of 35 and last take points in the SE/4SW/4 of Section 2, and (b) the El Jefe 35/2 W0DM Fed. Com. Well No. 1H and the El Jefe 35/2 W1DM Fed. Com. Well No. 1H, with first take points in the NW/4NW/4 of 35 and last take points in the SW/4SW/4 of Section 2. 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, completing, and equipping the wells.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

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

Brad Dunn 15 min. Approx. 6 (landman)

Tyler Hill 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

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Santa Fe, New Mexico 87504

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Attorney for Mewbourne Oil Company