

**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. 21497 & 21498**

**PRE-HEARING STATEMENT**

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

**APPEARANCES**

**APPLICANT**

Mewbourne Oil Company  
Suite 1020  
500 West Texas  
Midland, Texas 79701

Attention: Brad Dunn  
(432) 682-3715

**APPLICANT'S ATTORNEY**

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

**OPPONENT**

MRC Permian Company  
XTO Energy Inc.

**OPPONENT'S ATTORNEY**

Holland & Hart LLP

**STATEMENT OF THE CASE**

**APPLICANT**

Case No. 21497: formation underlying a horizontal spacing unit comprised of the N/2 of Section 23 and the N/2 of Section 24, Township 22 South, Range 27 East, NMPM. The unit will be dedicated to (a) The Tommy Boy 23/24 W0EH Fed. Com. Well No. 1H, with a first take point in the SW/4NW/4 of 23 and a last take point in the SE/4NE/4 of Section 24, and (b) The Tommy Boy 23/24 W0DA Fed. Com. Well No. 1H, with a first take point in the NW/4NW/4 of 23 and a last take point in the NE/4NE/4 of Section 24

Case No. 21498: Mewbourne Oil Company seeks an order pooling all mineral interests in the Wolfcamp formation underlying a horizontal spacing unit comprised of the S/2 of Section 23 and the S/2 of Section 24, Township 22 South, Range 27 East, NMPM. The unit will be dedicated to

(a) The Tommy Boy 23/24 WOLI Fee Well No. 1H, with a first take point in the NW/4SW/4 of 23 and a last take point in the NE/4SE/4 of Section 24, and (b) The Tommy Boy 23/24 WOMP Fee Well No. 1H, with a first take point in the SW/4SW/4 of 23 and a last take point in the SE/4SE/4 of Section 24.

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

Brad Dunn  
(landman)

EST. TIME

15 min.

EXHIBIT

Approx. 10

Tyler Hill  
(geologist)

15 min.

Approx. 8

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,

  
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Attorney for Mewbourne Oil Company

**CERTIFICATE OF SERVICE**

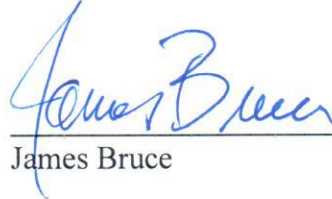
I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 29th day of October, 2020 by e-mail:

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James Bruce