

**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 21330**

**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

Attention: Carson Cullen  
(432) 682-3715

**APPLICANT'S ATTORNEY**

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

**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 NW/4 of Section 22 and the W/2 of Section 15, Township 25 South, Range 28 East, NMPM. The unit will be dedicated to the Bonanza 22/15 W0ED Fed. Com. Well No. 1H, Bonanza 22/15 W1ED Fed. Com. Well No. 2H, Bonanza 22/15 W0FC Fed. Com. Well No. 1H, and Bonanza 22/15 W1FC Fed. Com. Well No. 2H. The wells have first take points in the S/2NW/4 of Section 22, and last take points in the N/2NW/4 of Section 15. 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>
Carson Cullen (landman)	15 min.	Approx. 6
Tyler Hill (geologists)	10 min.	Approx. 6

### OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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## **PROCEDURAL MATTERS**

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

Respectfully submitted,

  
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James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

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 28th day of January, 2021 by e-mail:

Kaitlyn Luck  
[kaluck@hollandhart.com](mailto:kaluck@hollandhart.com)

  
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James Bruce