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

APPLICATION OF MEWBOURNE OIL COMPANY TO POOL ADDITIONAL INTEREST OWNERS UNDER THE TERMS OF ORDER NO. R-21053, EDDY COUNTY, NEW MEXICO

CASE NO. 21933 ORDER NO. R-21053

PRE-HEARING STATEMENT

Mewbourne Oil Company ("Applicant") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT ATTORNEYS

Mewbourne Oil Company Dana S. Hardy
Michael Rodriguez

P.O. Box 2068

Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 982-8623

dhardy@hinklelawfirm.com mrodriguez@hinklelawfirm.com

INTERESTED PARTIES ATTORNEYS

MRC Permian Company Michael H. Feldewert

Adam G. Rankin Julia Broggi

Kaitlyn A. Luck

Post Office Box 2208

Santa Fe, New Mexico 87504

(505) 988-4421

mfeldewert@hollandhart.com agrankin@hollandhart.com jbroggi@hollandhart.com kaluck@hollandhart.com

STATEMENT OF THE CASE

Applicant seeks to pool additional interest owners under the terms of Oil Conservation Division Order No. R-21053 ("Order"), which created a 240-acre, more or less, standard horizontal spacing unit comprised of the N/2S/2 of Section 13, Township 19 South, Range 28 East and the N/2 SW/4 of Section 18, Township 19 South, Range 29 East in Eddy County, New Mexico ("Unit"), and designated Mewbourne as the operator of the Unit. The Order further pooled the uncommitted interests in the Bone Spring formation (Scanlon Draw; Bone Spring pool (55510)). and dedicated the Unit to the following wells: Rattlesnake 13/18 B2LK State Com #1H, which will be horizontally drilled from a surface location in Unit L in Section 13, Township 19 South, Range 28 East to a bottom hole location in Unit K in Section 18, Township 19 South, Range 29 East; and Rattlesnake 13/18 B3LK State Com #1H, which will be horizontally drilled from a surface location in Unit L in Section 13, Township 19 South, Range 28 East to a bottom hole location in Unit K in Section 18, Township 19 South, Range 29 East. On December 15, 2020, the Division granted Mewbourne's request for a time extension to commence drilling the wells authorized under the Order to January 31, 2022. Since the above-described order and extension were issued, Mewbourne has determined there are additional interest owners in the Unit whose interests should be pooled under the terms of the Order. The wells are located approximately 14 miles northeast of Carlsbad, New Mexico.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits	
Lee Scarborough	Landman	Affidavit	Approx. 8	

PROCEDURAL MATTERS

Applicant will present its case by affidavit if there is no opposition to its application.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

Dana S. Hardy Michael Rodriguez P.O. Box 2068 Santa Fe, NM 87504-2068

Phone: (505) 982-4554 Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com mrodriguez@hinklelawfirm.com Counsel for Mewbourne Oil Company

CERTIFICATE OF SERVICE

I hereby certify that on May 27, 2021, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
mfeldewert@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com
Attorneys for MRC Permian Company

/s/ Dana S. Hardy
Dana S. Hardy