# 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. 21960

## 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:

Grad Dunn

(432) 682-3715

**OPPONENT** 

MRC Permian Company

APPLICANT'S ATTORNEY

James Bruce P.O. Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

OPPONENT'S ATTORNEY

Holland & Hart LLP

#### STATEMENT OF THE CASE

#### **APPLICANT**

Mewbourne Oil Company seeks to re-open Case No. 21496 for an order pooling additional mineral interest owners in the Wolfcamp formation underlying a horizontal spacing unit comprised of the N/2 of Section 28 and the N/2 of Section 29, Township 22 South, Range 27 East, NMPM. The unit will be dedicated to (a) The City Slickers 28/29 W0HE Fee Well No. 1H, with a first take point in the SE/4NE/4 of 28 and a last take point in the SW/4NW/4 of Section 29, and (b) The City Slickers 28/29 W0AD Fee Well No. 1H, with a first take point in the NE/4NE/4 of 28 and a last take point in the NW/4NW/4 of Section 29. 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 10 min. Approx. 6

(landman)

Charles Crosby 10 min. Approx. 6

(geologist)

**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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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 June, 2021 by e-mail:

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