

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

**APPLICATION OF MEWBOURNE OIL COMPANY  
FOR COMPULSORY POOLING AND APPROVAL OF  
OVERLAPPING WELL UNITS,  
EDDY COUNTY, NEW MEXICO**

**Case Nos. 22727-22728**

**PREHEARING STATEMENT**

This pre-hearing statement is submitted by Ann Landrith Holdings, LLC, by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**  
Mewbourne Oil Company

**ATTORNEY:**  
James Bruce

**OPPOSITION OR OTHER PARTY:**

Snow Oil & Gas, TransRam, LLC, Nona Snow Estate  
and Grace Smith (here and after the "Snow Group")

Ernest L. Padilla  
Padilla Law Firm, P.A.  
PO Box 2523  
Santa Fe, NM 87504  
505-988-7577

**STATEMENT OF CASE**

**APPLICANT:**

**OPPOSITION OR OTHER PARTY**

The Snow Group contends that the Applicant, Mewbourne Oil Company, has not offered comparable bonus payments for lease of their interests. They further contend that Mewbourne has employed the compulsory pooling procedure as a lever to unfairly acquire The Snow Group interests.

**PROPOSED EVIDENCE**

**APPLICANT**

**OPPOSITION**

<b>WITNESSES</b>	<b>EST. TIME</b>	<b>EXHIBITS</b>
Dan Snow	15 minutes	5

**PROCEDURAL MATTERS**

None.

Respectfully submitted,  
PADILLA LAW FIRM, P.A.  
**/s/ ERNEST L. PADILLA**  
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing pleading was electronically mailed to the following:

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on this 8<sup>th</sup> day of June, 2022.

**/s/ ERNEST L. PADILLA**  
Ernest L. Padilla