

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

2013 JUN 18 A 8:23

IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:

APPLICATION OF MEWBOURNE OIL
COMPANY TO ABOLISH THE SPECIAL
RULES AND REGULATIONS FOR THE
SOUTH CULEBRA BLUFF-BONE SPRING
POOL, EDDY COUNTY, NEW MEXICO.

Case No. 14,991

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: D. Paul Haden
(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

The South Culebra Bluff-Bone Spring Pool was created by Division Order R-6139, and currently includes the following acreage:

Township 22 South, Range 28 East, N.M.P.M.

Section 34: S/2

Section 35: W/2

Township 23 South, Range 28 East, N.M.P.M.

Section 2: All
 Section 11: All
 Sections 13-16: All
 Section 21: NE/4
 Section 22: NE/4
 Sections 23-27: All
 Section 28: E/2

Township 23 South, Range 29 East, N.M.P.M.

Section 7: SW/4
 Section 18: NW/4

Division Order R-6139 also established Special Rules and Regulations for the South Culebra Bluff-Bone Spring Pool, providing for 80 acre spacing, wells to be located within 150 feet of the center of a quarter-quarter section or lot, and a depth bracket allowable of 222 barrels of oil per day. Applicant requests that the Special Rules and Regulations for the South Culebra Bluff-Bone Spring Pool be abolished, so that the pool will be governed by the Division's statewide rules, with the exception that existing 80 acre well units be grandfathered in.

OPPONENT**PROPOSED EVIDENCE**APPLICANT

| <u>WITNESSES</u> | <u>EST. TIME</u> | <u>EXHIBITS</u> |
|----------------------------|------------------|-----------------|
| D. Paul Haden (landman) | 10 min. | Approx. 3 |
| Tyler Hill (geologist) | 15 min. | Approx. 4 |
| Drew Robison (engineer) | 15 Min. | Approx. 4 |

OPPONENT

| <u>WITNESSES</u> | <u>EST. TIME</u> | <u>EXHIBITS</u> |
|------------------|------------------|-----------------|
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PROCEDURAL MATTERS

-None-

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "James Bruce", is written over a horizontal line.

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

Attorney for Mewbourne Oil Company