

JAMES BRUCE
ATTORNEY AT LAW

POST OFFICE BOX 1056
SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213
SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone)
(505) 660-6612 (Cell)
(505) 982-2151 (Fax)

jamesbruc@aol.com

RECEIVED OGD

2016 AUG 31 P 3:02

August 30, 2016

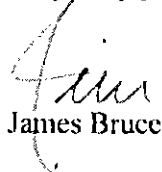
Case 15552

Florene Davidson
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Dear Florene:

Enclosed for filing, on behalf of Mewbourne Oil Company, are an application for compulsory pooling, *etc.*, together with a proposed advertisement. Please set the application for the September 29, 2016 Examiner hearing. Thank you.

Very truly yours,



James Bruce

Attorney for Mewbourne Oil Company

Parties Being Notified

Mr. James Wesley Welch
c/o Harold L. Hensley, Jr.
KELLY HART & HALLMAN, LLP
508 West Wall, Suite 444
Midland, Texas 79701

Mr. Joe Michael Welch
c/o Harold L. Hensley, Jr.
KELLY HART & HALLMAN, LLP
508 West Wall, Suite 444
Midland, Texas 79701

Ms. Barbara Grace Parker
c/o Harold L. Hensley, Jr.
KELLY HART & HALLMAN, LLP
508 West Wall, Suite 444
Midland, Texas 79701

Mr. Fred Walter Raether
c/o Mr. Norman McDonald
NORMAN MCDONALD, PA
P. O. Box 949
Belen, NM 87002

Mr. Steven Lee Raether
c/o Mr. Norman McDonald
NORMAN MCDONALD, PA
P. O. Box 949
Belen, NM 87002

Mr. Waylon Raether
c/o Mr. Norman McDonald
NORMAN MCDONALD, PA
P. O. Box 949
Belen, NM 87002

Ms. Amanda Marie Walker
c/o Mr. Norman McDonald
NORMAN MCDONALD, PA
P. O. Box 949
Belen, NM 87002

Mr. Blair Seaton Crooke
c/o Mr. Scott S. Morgan
CAVIN & INGRAM, PC
P. O. Box 1216
Albuquerque, NM 87103

Mr. Forest Ashley Crooke
261 Lakeview Lane
Englewood, FL 34223-3023

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

RECEIVED 000

APPLICATION OF MEWBOURNE OIL COMPANY 2016 AUG 31 P 3:02
FOR A NON-STANDARD OIL SPACING AND
PRORATION UNIT AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.

Case No. 15552

APPLICATION

Mewbourne Oil Company applies for an order (i) approving a 320 acre non-standard oil spacing and proration unit in the Bone Spring formation comprised of the $W\frac{1}{2}W\frac{1}{2}$ of Section 27 and the $W\frac{1}{2}W\frac{1}{2}$ of Section 22, Township 26 South, Range 27 East, N.M.P.M., Eddy County, New Mexico. and (ii) pooling all mineral interests in the Bone Spring formation underlying the non-standard unit, and in support thereof, states:

1. Applicant is an interest owner in the $W\frac{1}{2}W\frac{1}{2}$ of Section 27 and the $W\frac{1}{2}W\frac{1}{2}$ of Section 22. and has the right to drill a well thereon.
2. Applicant has drilled the Owl Draw 27/22 B2MD Fed. Com. Well No. 1H to a depth sufficient to test the Bone Spring formation. Applicant seeks to dedicate the $W\frac{1}{2}W\frac{1}{2}$ of Section 27 and the $W\frac{1}{2}W\frac{1}{2}$ of Section 22 to the well to form a non-standard 320 acre oil spacing and proration unit (project area) in the Bone Spring formation. The well is a horizontal well, with a surface location 170 feet from the south line and 330 feet from the west line of Section 27, and a terminus 330 feet from the north line and 330 feet from the west line of Section 22.
3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the $W\frac{1}{2}W\frac{1}{2}$ of Section 27 and the $W\frac{1}{2}W\frac{1}{2}$ of Section 22 for the purposes set forth herein.
4. Although applicant attempted to obtain voluntary agreements from all mineral interest owners to participate in the drilling of the well or to otherwise commit their interests to

the well, certain interest owners have failed or refused to join in dedicating their interests. Therefore, applicant seeks an order pooling all mineral interest owners in the Bone Spring formation in the $W\frac{1}{2}W\frac{1}{2}$ of Section 27 and the $W\frac{1}{2}W\frac{1}{2}$ of Section 22, pursuant to NMSA 1978 §§70-2-17, 18.

5. Approval of the non-standard unit and the pooling of all mineral interests in the Bone Spring formation underlying the $W\frac{1}{2}W\frac{1}{2}$ of Section 27 and the $W\frac{1}{2}W\frac{1}{2}$ of Section 22 will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

WHEREFORE, applicant requests that, after notice and hearing, the Division enter its order:

- A. Approving a non-standard oil spacing and proration unit (project area) in the Bone Spring formation comprised of the $W\frac{1}{2}W\frac{1}{2}$ of Section 27 and the $W\frac{1}{2}W\frac{1}{2}$ of Section 22;
- B. Pooling all mineral interests in the Bone Spring formation underlying the $W\frac{1}{2}W\frac{1}{2}$ of Section 27 and the $W\frac{1}{2}W\frac{1}{2}$ of Section 22;
- C. Designating applicant as operator of the well;
- D. Considering the cost of drilling and completing the well, and allocating the cost among the well's working interest owners;
- E. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and
- F. Setting a 200% charge for the risk involved in drilling and completing the well in the event a working interest owner elects not to participate in the well.

Respectfully submitted,

A handwritten signature in cursive script, reading "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

PROPOSED ADVERTISEMENT

Case No. 15552 :

Application of Mewbourne Oil Company for a non-standard oil spacing and proration unit and compulsory pooling, Eddy County, New Mexico. Mewbourne Oil Company seeks an order approving a 320-acre non-standard oil spacing and proration unit (project area) in the Bone Spring formation comprised of the W/2W/2 of Section 27 and the W/2W/2 of Section 22, Township 26 South, Range 27 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Bone Spring formation underlying the non-standard unit. The unit is to be dedicated to the Owl Draw 27/22 B2MD Fed. Com. Well No. 1H, a horizontal well with a surface location 170 feet from the south line and 330 feet from the west line of Section 27, and a terminus 330 feet from the north line and 330 feet from the west line of Section 22. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The unit is located approximately 14-1/2 miles south-southeast of Black River Village, New Mexico.