

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

**APPLICATION OF MEWBOURNE OIL COMPANY
FOR A NON-STANDARD OIL SPACING AND
PRORATION UNIT AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NO. 15926

**APPLICATION OF PRIME ROCK RESOURCES, LLC
FOR A NON-STANDARD SPACING AND
PRORATION UNIT AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NO.15971

PRIME ROCK's CONSOLIDATED PRE-HEARING STATEMENT

Prime Rock Resources, LLC ("Prime Rock") submits this pre-hearing statement as required by the Oil Conservation Division Rule 19.15.4.13.B.

APPEARANCES

APPLICANT

Mewbourne Oil Company

ATTORNEY

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OPPONENT

Prime Rock Resources, LLC

ATTORNEY

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STATEMENT OF THE CASE

These matters involve competing well proposals for development of the Bone Spring formation underlying a proposed non-standard 320-acre spacing and proration unit in the Bone Spring formation comprised of the E/2 W/2 of Sections 20 and 29 in Township 21 South, Range 32 East, NMPM, Lea County, New Mexico. In **Case No. 15926** Mewbourne Oil Company ("Mewbourne") seeks to develop this acreage with its proposed Caper 20/29 B2CN Fed. Com. Well No. 1H. In **Case No. 15971** Prime Rock seeks to develop this acreage with its proposed Olive Woolly Bugger 20-29 Federal Com #1H to be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of adjacent Section 17 to a standard bottom hole location in the SE/4 SW/4 (Unit N) of Section 29.

PRIME ROCK'S PROPOSED EVIDENCE

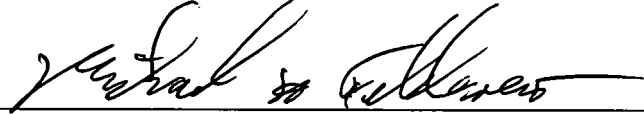
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Jason South, VP of Land and Business Development	Approx. 15 minutes	Approx. 5
David DaGian, VP of Exploration	Approx. 15 minutes	Approx. 5
Manny Sirgo, President and CEO	Approx. 10 minutes	Approx. 3

PROCEDURAL MATTERS

Prime Rock requests that Cases 15926 and 15971 be consolidated for hearing.

Respectfully submitted,

HOLLAND & HART LLP



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ATTORNEYS FOR PRIME ROCK RESOURCES, LLC

CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2018, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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