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

August 7, 2018

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

Case 16392

AUG 07 2018 PHD4:33

Dear Florene:

Enclosed for filing, on behalf of Mewbourne Oil Company, are an application for compulsory pooling, together with a proposed advertisement. Please set the application for the September 6, 2018 Examiner hearing. Thank you.

Very truly yours,

James Bruce

Attorney for Mewbourne Oil Company

PARTIES NOTIFIED

ConocoPhillips Company

Devon Energy Production Company, L.P.

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF MEWBOURNE OIL COMPANY FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

Case No. 16392

APPLICATION

Mewbourne Oil Company applies for an order pooling all mineral interests in the Bone Spring formation in a horizontal spacing unit comprised of the W/2E/2 of Section 16 and the W/2SE/4 of Section 9, Township 20 South, Range 35 East, N.M.P.M., Lea County, New Mexico, and in support thereof, states:

- 1. Applicant is an interest owner in the W/2E/2 of Section 16 and the W/2SE/4 of Section 9, and has the right to drill a well thereon.
- 2. Applicant proposes to drill the Sand Chute 9/16 B2JO Fed. Com. Well No. 1H to a depth sufficient to test the Bone Spring formation, and has dedicated the W/2E/2 of Section 16 and the W/2SE/4 of Section 9 to the well to form a 240 acre horizontal spacing unit in the Bone Spring formation. The well is a horizontal well, with a surface location in the SW/4NE/4 of Section 9, a first take point in the NW/4SE/4 of Section 9, and a final take point in the SW/4SE/4 of Section 16.
- 3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the W/2E/2 of Section 16 and the W/2SE/4 of Section 9 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/2E/2 of Section 16 and the W/2SE/4 of Section 9, pursuant to NMSA 1978 §§70-2-17.

5. The pooling of all mineral interests in the Bone Spring formation underlying the W/2E/2 of Section 16 and the W/2SE/4 of Section 9 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. Pooling all mineral interests in the Bone Spring formation underlying the W/2E/2 of Section 16 and the W/2SE/4 of Section 9;
- B. Designating applicant as operator of the well;
- C. Considering the cost of drilling and completing the well, and allocating the cost among the well's working interest owners;
- D. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and
- E. 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,

James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attorney for Mewbourne Oil Company

PROPOSED ADVERTISEMENT

Application of Mewbourne Oil Company for compulsory pooling, Lea County, New Mexico. Mewbourne Oil Company seeks an order pooling all mineral interests in the Bone Spring formation underlying a horizontal spacing unit comprised of the W/2E/2 of Section 16 and the W/2SE/4 of Section 9, Township 20 South, Range 35 East, NMPM. The unit will be dedicated to the Sand Chute 9/16 B2JO Fed. Com. Well No. 1H, a horizontal well with a surface location in the SW/4NE/4 of Section 9, a first take point in the NW/4SE/4 of Section 9, and a final take point in the SW/4SE/4 of Section 16. 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 12 miles west-southwest of Monument, New Mexico.