

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

OCT 02 2018 PM 02:20

October 2, 2018

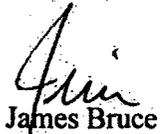
Florene Davidson
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Case 16494

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 November 1, 2018 Examiner hearing. Thank you.

Very truly yours,


James Bruce

Attorney for Mewbourne Oil Company

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION**APPLICATION OF MEWBOURNE OIL COMPANY
FOR COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO.**Case No. 16494**APPLICATION**

Mewbourne Oil Company applies for an order pooling all mineral interests in the Wolfcamp formation underlying a horizontal spacing unit comprised of the N/2 of Section 20 and the N/2 of Section 19, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico, and in support thereof, states:

1. Applicant is an interest owner in the N/2 of Section 20 and the N/2 of Section 19, and has the right to drill a well or wells thereon.

2. Applicant proposes to drill the following wells:

(a) The Little Giants 20/19 W0AD Fed. Com. Well No. 1H to a depth sufficient to test the Wolfcamp formation. The well is a horizontal well with a first take point in the NE/4NE/4 of 20 and a final take point in the NW/4NW/4 of Section 19;

(b) The Little Giants 20/19 W0HE Fed. Com. Well No. 2H to a depth sufficient to test the Wolfcamp formation. The well is a horizontal well with a first take point in the SE/4NE/4 of 20 and a final take point in the SW/4NW/4 of Section 19; and

(c) The Little Giants 20/19 W0HE Fed. Com. Well No. 3H to a depth sufficient to test the Wolfcamp formation. The well is a horizontal well with a first take point in the SE/4NE/4 of 20 and a final take point in the SW/4NW/4 of Section 19.

Applicant will dedicate N/2 of Section 20 and the N/2 of Section 19 to the wells.

3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the N/2 of Section 20 and the N/2 of Section 19 for the purposes set forth herein.

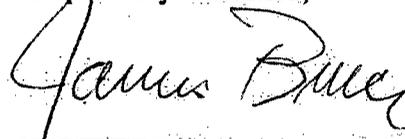
4. Although applicant attempted to obtain voluntary agreements from all mineral interest owners to participate in the drilling of the wells or to otherwise commit their interests to the wells, certain interest owners have failed or refused to join in dedicating their interests. Therefore, applicant seeks an order pooling all mineral interest owners in the Wolfcamp formation underlying the N/2 of Section 20 and the N/2 of Section 19, pursuant to NMSA 1978 §§70-2-17.

5. The pooling of all mineral interests in the Wolfcamp formation underlying the N/2 of Section 20 and the N/2 of Section 19 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 Wolfcamp formation underlying the N/2 of Section 20 and the N/2 of Section 19;
- B. Designating applicant as operator of the wells;
- C. Considering the cost of drilling and completing the wells, and allocating the cost among the wells' 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 wells in the event a working interest owner elects not to participate in the wells.

Respectfully submitted,

A handwritten signature in cursive script that reads "James Bruce". The signature is written in black ink and is positioned above 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. 16494:

Application of Mewbourne Oil Company for compulsory pooling, Eddy County, New Mexico.
Mewbourne Oil Company seeks an order pooling all mineral interests in the Wolfcamp formation in a horizontal spacing unit comprised of the N/2 of Section 20 and the N/2 of Section 19, Township 22 South, Range 28 East, NMPM. The unit will be dedicated to: (a) The Little Giants 20/19 W0AD Fed. Com. Well No. 1H, to be drilled to a depth sufficient to test the Wolfcamp formation. The well is a horizontal well with a first take point in the NE/4NE/4 of 20 and a final take point in the NW/4NW/4 of Section 19; (b) The Little Giants 20/19 W0HE Fed. Com. Well No. 2H to be drilled to a depth sufficient to test the Wolfcamp formation. The well is a horizontal well with a first take point in the SE/4NE/4 of 20 and a final take point in the SW/4NW/4 of Section 19; and (c) The Little Giants 20/19 W0HE Fed. Com. Well No. 3H to be drilled a depth sufficient to test the Wolfcamp formation. The well is a horizontal well with a first take point in the SE/4NE/4 of 20 and a final take point in the SW/4NW/4 of Section 19. Also to be considered will be the cost of drilling and completing the wells and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells. The unit is located approximately 7 miles east-southeast of Carlsbad, New Mexico.

DCT 02 2018 PM02:20