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

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

Case No. 20269

## MEWBOURNE OIL COMPANY'S PRE-HEARING STATEMENT

Mewbourne Oil Company ("Mewbourne") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

#### **APPEARANCES**

Mewbourne is the applicant in this case. Its business address is 500 West Texas Ave., Suite 1020, Midland, Texas 79701. Mewbourne is represented by the undersigned counsel.

#### STATEMENT OF THE CASE

Mewbourne's application seeks an order pooling all uncommitted mineral interests in the Third Bone Spring Sand interval of the Bone Spring formation in a 240-acre standard horizontal spacing unit comprised of the S/2 S/2 of Section 11 and the S/2 SW/4 of Section 12, Township 19 South, Range 29 East, N.M.P.M., in Eddy County.

Mewbourne proposes to dedicate the horizontal spacing unit to the Sapphire 11/12 B3MN State Com #2H well, which will be horizontally drilled from a surface location in Unit M in Section 11 to a last take point in Unit N in Section 12, Township 19 South, Range 29 East. Mewbourne will drill the well to a depth sufficient to test the Third Bone Spring Sand interval of the Bone Spring formation. The completed interval for the well will be orthodox.

#### PROPOSED EVIDENCE

WITNESS	ESTIMATED TIME	<b>EXHIBITS</b>
Paul Haden (Landman)	10 minutes	Approx. 6
Charles Crosby (Geologist)	10 minutes	Approx. 4

Mewbourne reserves the right to call a rebuttal witness(es) if appropriate.

### **PROCEDURAL MATTERS**

Mewbourne is not aware of any procedural matters to be resolved prior to the hearing. If there is no opposition to its application, Mewbourne will present its case by affidavit.

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