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. 20930

MEWBOURNE OIL COMPANY'S <u>PRE-HEARING STATEMENT</u>

Mewbourne Oil Company ("Mewbourne") submits its Pre-Hearing Statement pursuant to

the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

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Mewbourne Oil Company

APPLICANT'S ATTORNEYS

Gary W. Larson Dana S. Hardy P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 982-8623 glarson@hinklelawfirm.com dhardy@hinklelawfirm.com

INTERESTED PARTIES

MRC Permian Company and MRC Permian LKE Company, LLC

INTERESTED PARTIES' ATTORNEYS

Michael H. Feldewert Adam G. Rankin Julia Broggi Kaitlyn A. Luck P.O. Box 2208 Santa Fe, NM 87504-2208 Phone: (505) 988-4421 Facsimile: (505) 983-6043 mfeldewert@hollandhart.com agrankin@hollandhart.com jbroggi@hollandhart.com kaluck@hollandhart.com

STATEMENT OF THE CASE

Mewbourne's application seeks an order pooling all uncommitted mineral interests in the Wolfcamp formation in a 640-acre, more or less, standard horizontal spacing unit comprised of the E/2 of Section 28 and the E/2 of Section 21, Township 23 South, Range 28 East in Eddy County, New Mexico. Mewbourne proposes to dedicate the horizontal spacing unit to the following wells: (1) the Starship 28-21 W0OB Fee #1H well, which will be horizontally drilled from a surface location in Unit P in Section 28 to a bottom hole location in Unit B in Section 21; and (2) the Starship 28-21 W0OB Fee #2H well, which will be horizontally drilled from a surface location 28 to a bottom hole location in Unit P in Section 28 to a bottom hole location 21. The completed intervals for the wells will be orthodox.

PROPOSED EVIDENCE

WITNESS	ESTIMATED TIME	EXHIBITS
Tyler Jolly (Landman)	10 minutes	Approx. 6
Tyler Hill (Geologist)	10 minutes	Approx. 5

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. HINKLE SHANOR, LLP

Gary W. Larson

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Counsel for Mewbourne Oil Company

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Pre-Hearing Statement was sent to the following counsel of record by electronic mail on December 5, 2019.

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