# STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION ARING CALLED BY TOP THE F

# IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE **PURPOSE OF CONSIDERING:**

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

**CASE NO. 14386** 

### **PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by Holland & Hart LLP as required by the rules of the Oil Conservation Division.

# **APPEARANCES OF PARTIES**

### APPLICANT

### ATTORNEY

Mewbourne Oil Company Attn: Mr. D. Paul Haden 500 West Texas, Suite 1020 Midland, Texas 79701 (432) 682-3715

William F. Carr, Esq. Holland & Hart LLP Post Office Box 2208 Santa Fe. New Mexico 87504 (505) 988-4421

# STATEMENT OF CASE

### **APPLICANT:**

Applicant in the above-styled cause seeks an order pooling all mineral interests from a depth of 3,350 feet subsurface through the base of the Morrow formation in the following described spacing and proration units located in the S/2 of Section 29, Township 18 South, Range 30 East, N.M.P.M., Eddy County, New Mexico: the S/2 for all formations and/or pools developed on 320-acre spacing which includes but is not necessarily limited to the Undesignated North Turkey Track-Morrow Gas Pool; Undesignated Benson-Strawn Gas Pool; the SE/4 for all formations and/or pools developed on 160-acre spacing; the S/2 SE/4 for all formations and/or pools developed on 80-acre spacing which includes but is not necessarily limited to the Undesignated Santo Nino-Bone Spring Pool; and the SW/4 SE/4 for all formations and/pools developed on 40acre spacing which includes but is not limited to the North Benson-Queen-Grayburg Pool;

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Undesignated South Loco Hills-San Andres Pool; Undesignated South Leo Wolfcamp Pool. Applicant, dedicate these pooled units to its Bradley "29" Federal Com Well No. 1 to be drilled at a standard gas well location 660 feet from the South line and 1980 feet from the East line of said Section 29 to an approximate total depth of 11,800 feet to test any and all formations from a depth of 3,350 feet subsea through the base of the Morrow formation. Also to be considered will be the cost of drilling and completing said well as well as actual operating costs and charges for supervision, designation of applicant as operator of the well and a charge for risk involved in drilling said well.

# **PROPOSED EVIDENCE**

APPLICANT

WITNESSES (Name and Expertise) ESTIMATED TIME

EXHIBITS

Mewbourne Oil Company will present this case by affidavit.

# **PROCEDURAL MATTERS**

Mewbourne Oil Company has none at this time.

William F. Carr Attorney for Mewbourne Oil Company