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

AMENDED APPLICATION OF APACHE CORPORATION FOR COMPULSORY POOLING AND APPROVAL OF A HORIZONTAL SPACING UNIT AND POTASH AREA DEVELOPMENT AREA, EDDY COUNTY, NEW MEXICO

Case No. 20171 Order No. R-21258

MEWBOURNE OIL COMPANY'S APPLICATION FOR HEARING DE NOVO

Pursuant to NMSA 1978, Section 70-2-13 and 19.15.4.23(A) NMAC, Mewbourne Oil

Company, a party of record adversely affected by Order No. R-21258 (issued April 14, 2020),

requests that this matter be heard de novo before the Oil Conservation Commission.

Respectfully submitted,

HINKLE SHANOR LLP Dana S. Hardy

Dioscoro "Andy" Blanco P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com dblanco@hinklelawfirm.com

Counsel for Mewbourne Oil Company

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of May, 2020, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

Earl E. DeBrine, Jr. Modrall, Sperling, Roehl, Harris & Sisk, P.A. Post Office Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, New Mexico 87103-2168 Phone: (505) 848-1800 edebrine@modrall.com *Counsel for Apache Corporation*

James Bruce Post Office Box 1056 Santa Fe, NM 87504 Phone: (505) 982-2043 jamesbruc@aol.com *Counsel for Ascent Energy LLC*

Ernest L. Padilla Padilla Law Firm, P.A. Post Office Box 2523 Santa Fe, NM 87504 Phone: (505) 988-7577 padillalaw@qwestoffice.net *Counsel for EOG Resources, Inc.*

Dalva L. Moellenberg Gallagher & Kennedy, PA 1239 Paseo de Peralta Santa Fe, NM 87501-2758 dlm@gknet.com *Counsel for Oxy USA, Inc.*

Dana S. Hardy