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

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. 20202 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 MAL

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

•