

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

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

CASE 25228

**APPLICATION OF PBEX OPERATIONS, LLC
FOR COMPULSORY POOLING AND APPROVAL
OF AN OVERLAPPING SPACING UNIT,
EDDY COUNTY AND LEA COUNTY, NEW MEXICO.**

CASE 25301

**APPLICATION OF PBEX OPERATIONS, LLC
FOR COMPULSORY POOLING AND APPROVAL
OF AN OVERLAPPING SPACING UNIT,
EDDY COUNTY AND LEA COUNTY, NEW MEXICO.**

CASE 25303

JOINT MOTION TO VACATE AND RESCHEDULE HEARING

The parties in this matter, PBEX Operations, LLC and Mewbourne Oil Company (the “Parties”), jointly move that the contested hearing that is currently set for July 1, 2025, be vacated for these cases and rescheduled or continued to a date in August. In support of this motion, the Parties state as follows:

1. These competing cases are set for a contested hearing on July 1, 2025. Case 25228 has been filed by Mewbourne Oil Company (Mewbourne) and Cases 25301 and 25303 have been filed by PBEX Operations, LLC (PBEX).
2. The Landman for PBEX has had an unexpected family emergency involving a family member that has been placed on hospice care, as explained in the sworn statement attached as Exhibit A.
3. PBEX has communicated this unexpected event to Mewbourne and Mewbourne is willing to move the contested docket date due to the emergency. ConocoPhillips supports this motion.
4. PBEX does not have another land professional available who could cover the

contested hearing.

5. A later setting will both allow all Parties to have their witnesses available for testimony, and provide the possibility of at least partial issue resolution, and thus a more succinct presentation of the issues to the Hearing Examiner.

6. No party will be prejudiced by delaying the hearing.

WHEREFORE, the Parties request that the contested hearing be set for a date in August, and all interim due dates be vacated.

Respectfully submitted,

/s/ Jennifer L. Bradfute

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CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2025, I served a copy of the foregoing document to the following counsel of record via electronic mail:

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/s/ Matthias Sayer

Matthias Sayer

Exhibit A

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CASE 25303

SELF-AFFIRMED STATEMENT OF RUTH PELZEL

I, Ruth Pelzel, Landman for PBEX Operations, LLC ("PBEX"), the Applicant in Case Nos. 25301 and 25303, as well as a party to Case No. 25228, state and affirm the following:

1. I am over the age of 18, have personal knowledge of the matters addressed herein, and am competent to provide this Self- Affirmed Statement, I have previously testified before the New Mexico Oil Conservation Division ("Division") and my credentials as an expert in petroleum landman matters were accepted and made part of the record.

2. The Division issued a Pre-Hearing Order following a status conference on April 24, 2025, setting consolidate Case Nos. 25228, 25301, and 25303 for contested hearing on July 1, 2025.

3. I will serve as PBEX's landman expert and witness in the above matters. My testimony in the above matters is critical to PBEX's application. My aunt, who I am close

with, has been put on hospice and our family (only living heirs) require my assistance to prepare for her end of life matters. I will be out of the office periodically over the next several weeks to help my aunt and family during this medical event.

4. This is an unforeseen family emergency that has arisen after the Pre-Hearing Order was issued, I will be unavailable to present testimony on the July 1, 2025 hearing date and there is not another land professional at PBEX who can cover this hearing for the company.

5. PBEX Operations is a smaller operator, and I am the only landman who works on New Mexico matters. My supervisor, who has previously worked on New Mexico land matters will be out of the country on a previously planned trip on July 1, 2025, and is unable to attend the hearing. There are no other land professionals at PBEX who could provide testimony on July 1, 2025.

6. I make this Affidavit in conjunction with a Joint Motion to Vacate and Reschedule the above case numbers, whereby all parties request a rescheduling of the hearing date to a date in August 2025.

I understand that this Self-Affirmed Statement will be used as written testimony before the Division in above-referenced Case Nos. and affirm that my testimony herein is true and correct, to the best of my knowledge and belief and made under penalty of perjury under the laws of the State of New Mexico.



Ruth Pelzel



Date Signed