

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

**APPLICATION OF MEWBOURNE OIL COMPANY
FOR APPROVAL OF EXPANSION OF A UNIT AREA,
LEA COUNTY, NEW MEXICO.**

CASE NO. 21418

JOINT MOTION FOR CONTINUANCE

COG Operating LLC (“COG”), Devon Energy Production Company, L.P., and Marathon Oil Permian LLC (“Marathon”) (collectively, the “Movants”), hereby move the Division for a continuance in this matter currently scheduled for the January 21, 2021 Examiner Hearing Docket, to the February 18, 2021 hearing, or at another special hearing date in February 2021. In support of this Motion, Movants state:

1. In the application filed in this case, Mewbourne Oil Company (“Mewbourne”) sought authorization approving a Unit Agreement for a proposed expansion of the North Wilson Deep Unit Area from 2,145.95 acres in Lea County, New Mexico, to 13,272.13 acres—an increase of more than six times the existing unit acreage, with the proposed expansion to include development of Bone Spring and Wolfcamp formations.

2. On January 14, 2021, Mewbourne filed its pre-hearing statement in this case reflecting that it is now only seeking to include the Bone Spring formation and is now removing certain acreage from the proposed unit expansion due to voluntary agreements with parties within the proposed unit area.

3. Mewbourne’s changes to the proposed unit expansion, just a few days before the hearing as reflected in the pre-hearing statement, are material and warrant a continuance in this case to allow the parties to consider those changes.

4. Moreover, as of January 15, 2021, Mewbourne has proposed a revised unit operating agreement to COG, but COG requires time to consider the proposed changes.

5. Movants continue to object to the proposed unit expansion due to concerns that remain unresolved and unaddressed by Mewbourne.

6. Accordingly, Movants collectively oppose the proposed expansion of the North Wilson Deep Unit Area and are unwilling to contribute their interests to the Unit Agreement or the expanded Unit Area as proposed at this time.

7. Division approval of the proposed Unit Agreement and the expanded Unit Area as proposed will inflict substantial injury to Movants' interests and correlative rights.

8. This application is contested.

9. Mewbourne opposes a continuance.

WHEREFORE, Movants respectfully request that the Division continue the hearing on this case from January 21, 2021, to the February 18, 2021, Examiner Hearing Docket, or to a special hearing date in February.

Respectfully submitted,

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