

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

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

CASE NOS. 26446-26447

**ENTRY OF APPEARANCE AND
OBJECTION TO CASE PROCEEDING BY AFFIDAVIT**

Kaitlyn A. Luck hereby appears in the above-referenced cases for FED Operating LLC,
and objects to the cases proceeding by affidavit.

Respectfully,
/s/ Kaitlyn A. Luck
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Attorney for FED Operating, LLC

CERTIFICATE OF SERVICE

I certify that on this August 12, 2026, the foregoing pleading was electronically filed with the New Mexico Oil Conservation Division Clerk and served on all parties of record through counsel as follows:

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/s/ Kaitlyn A. Luck

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

**APPLICATION OF FAE II OPERATING LLC
FOR STATUTORY UNITIZATION,
LEA COUNTY, NEW MEXICO.**

CASE NO. 23712

**AFFIDAVIT OF ERNEST PADILLA/LANDMAN REGARDING
NOTICE TO UNIT INTEREST OWNERS
IN SUPPORT OF CASE NO. 23712**

I _____, as _____ for FAE II Operating, LLC, hereby swear as follows:

1. FAE's proposed unitization was proposed to each of the working interest owners in the proposed Unit and FAE made a good faith effort to secure the voluntary unitization of

interest owners in the Unit Area. FAE identified [REDACTED] interest owners in the Unit; and has secured the voluntary agreement of _____% or (____insert number of interest owners).

2. FAE sent letters by certified mail providing each of the interest owners within the Unitized Formation, with notice of the Application for Statutory Unitization, in this case and the Division hearing on October 5, 2023. A copy of an example notice letter is attached hereto as FAE Exhibit __-1.
3. Certified mail tracking information from USPS showing the tracking status for each of the hearing notice letters is attached as FAE Exhibit __-2.
4. In addition to the notice letters, FAE undertook additional good faith efforts to locate and contact each of the uncommitted working interest owners in the Unit. First, FAE started with the last known address of record corresponding to the interest owned with the Unit. From there, FAE also conducted a diligent search of public records in Lea County, including phone directories and computer databases to locate each of the parties owning an interest within the proposed Unit. FAE also has a contracted brokerage company to conduct research to identify and locate mineral owners within the Unit.
5. [ADD ADDITIONAL INQUIRY/NOTICE PROVIDED TO INTEREST OWNERS]
6. Notice was also sent by email to those parties for which an email address was located.
7. FAE has maintained detailed records of follow-up emails and phone calls to every working interest owner.
8. Notice was also provided by mail to the Bureau of Land Management and the New Mexico State Land Office.
9. Next, notice was provided by the Oil Conservation Division in compliance with Division Rules.

10. Finally, FAE Exhibit __-3 is an Affidavit of Publication reflecting that FAE caused notice of the October 5, 2023 hearing on this application to be published at least ten (10) days, to each of the owners in the Unitized Formation, in advance of hearing in the newspaper of general circulation in Lea County.
11. FAE Exhibits ____-1 through ____-3 were either prepared by me or compiled under my direction and supervision.

FURTHER AFFIANT SAYETH NOT.

STATE OF NEW MEXICO/TEXAS)
COUNTY OF SANTA FE/ HARRIS)

ERNEST PADILLA [LANDMAN]
)

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority on this ____ day of _____, 2023, by _____.

My Commission Expires:

Notary Public in and for the State of New
Mexico Texas