

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

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

Case Nos. 21361 - 21364

**APPLICATION OF ASCENT ENERGY,
LLC FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO**

Case Nos. 21393 - 21394

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

Case Nos. 21489-21491

**MEWBOURNE OIL COMPANY'S EMERGENCY MOTION TO CONTINUE
FEBRUARY 18, 2021 HEARING AND EXTEND THE DEADLINE TO SUBMIT
EVIDENTIARY OBJECTIONS**

Mewbourne Oil Company ("Mewbourne") requests that the Oil Conservation Division issue an order: (1) continuing the February 18, 2021 hearing in these matters; and (2) extending the February 16, 2021 deadline for the parties to submit evidentiary objections. In support of this motion, Mewbourne states the following.

1. Mewbourne's witnesses reside in the Midland, Texas area and work at Mewbourne's office in Midland.
2. Due to winter storm conditions and issues associated with the power grid, the Midland-Odessa area has been experiencing severe power outages that are expected to continue for several days.

3. As a result of the power outages (including at Mewbourne's office), Mewbourne's witnesses have only had intermittent internet access and cell phone coverage and have not been able to download and review hearing exhibits, communicate internally or with counsel, or otherwise prepare for the hearing. At this point, it is also unclear whether they will be able to participate in the hearing via Webex, as internet outages are expected to continue after power is restored.
4. To afford Mewbourne an opportunity to prepare for the hearing and comport with due process requirements, Mewbourne requests a continuance of the February 18, 2021 hearing in this matter to the next date that is acceptable to the Division and the parties.
5. Because Mewbourne's witnesses have been unable to access or review the testimony and exhibits submitted by the other parties, Mewbourne also requests that the Division establish a new deadline for the parties to submit evidentiary objections after a new hearing date is determined.
6. Mewbourne requests that the Division hold a status conference in these matters during the February 18, 2021 hearing docket to discuss a new hearing date.
7. Counsel for Apache Corporation ("Apache"), Ascent Energy, LLC ("Ascent"), and EOG Resources, Inc. ("EOG") have been contacted regarding this motion. Apache is having similar issues and concurs in the motion, and Ascent does not oppose the motion. Counsel for Mewbourne was unable to ascertain the position of EOG prior to the filing deadline.

For the foregoing reasons, Mewbourne respectfully requests that the Division: (1) issue an order continuing these matters to the next mutually acceptable docket; and (2) establish a

new deadline for the submission of evidentiary objections after a new hearing date is determined.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of February, 2021, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

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