

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

**APPLICATION OF TOM M. RAGSDALE TO REVOKE  
ORDER NOS. R-20924 & R-20924-A OR, IN THE ALTERNATIVE,  
TO DECLARE UNREASONABLE CERTAIN COSTS  
IMPOSED BY MEWBOURNE OIL COMPANY**

**Case No. 21324  
Order No. R-21631**

**APPLICATION FOR HEARING DE NOVO**

Tom M. Ragsdale, pursuant to NMSA 1978, Section 70-2-13, requests the above-referenced matter be set for hearing de novo before the New Mexico Oil Conservation Commission on June 10, 2021.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/ Sharon T. Shaheen

Sharon T. Shaheen

John M. McIntyre

Post Office Box 2307

Santa Fe, New Mexico 87504-2307

(505) 986-2678

[sshaheen@montand.com](mailto:sshaheen@montand.com)

[jmcintyre@montand.com](mailto:jmcintyre@montand.com)

*Attorneys for Applicant Tom M. Ragsdale*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on April 16, 2021

James Bruce  
PO Box 1056  
Santa Fe, NM 87504  
[jamesbruc@aol.com](mailto:jamesbruc@aol.com)  
505-982-2043

*Attorney for Mewbourne Oil Co.*

*/s/ Sharon T. Shaheen*