

**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**

**UNOPPOSED MOTION FOR CONTINUANCE  
AND AMENDED PRE-HEARING ORDER**

Mewbourne Oil Company (“Mewbourne”) requests the Oil Conservation Division continue the above-referenced cases to the next mutually acceptable hearing docket and issue an amended pre-hearing order reflecting the revised hearing date. In support of this motion, Mewbourne states the following.

1. The above-referenced cases are set for hearing on September 8, 2021 pursuant to the Second Amended Pre-Hearing Order issued on May 25, 2021.
2. One of Mewbourne’s witnesses has become ill with Covid-19 and is unable to prepare for the hearing, cannot return to work for two weeks, and may be unable to participate in the hearing on September 8.
3. Additionally, due to the extensive history and substance of these cases, Mewbourne is unable to prepare and present a different witness to testify.

4. All parties of record have been notified regarding Mewbourne's circumstance and do not oppose this request.

For the foregoing reasons, Mewbourne respectfully requests the Division continue the above-referenced cases to the next mutually acceptable hearing docket and issue an amended pre-hearing order reflecting the revised hearing date.

Respectfully submitted,

HINKLE SHANOR LLP

/s/ Dana S. Hardy

Dana S. Hardy

Michael Rodriguez

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623

dhardy@hinklelawfirm.com

mrodriguez@hinklelawfirm.com

*Counsel for Mewbourne Oil Company*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 26, 2021, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

Earl E. DeBrine, Jr.  
Deana M. Bennett  
Modrall, Sperling, Roehl, Harris & Sisk, P.A.  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
Phone: (505) 848-1800  
edebrine@modrall.com  
dmb@modrall.com  
*Counsel for Apache Corporation*

Darin C. Savage  
Andrew D. Schill  
William E. Zimsky  
Abadie & Schill, P.C.  
214 McKenzie St.  
Santa Fe, NM 87501  
Phone: (970) 385-4401  
darin@abadieschill.com  
andrew@abadieschill.com  
bill@abadieschill.com  
*Counsel for Ascent Energy LLC*

Ernest L. Padilla  
Padilla Law Firm, P.A.  
Post Office Box 2523  
Santa Fe, NM 87504  
Phone: (505) 988-7577  
padillalaw@qwestoffice.net  
*Counsel for EOG Resources, Inc.*

/s/ Dana S. Hardy  
Dana S. Hardy